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FOREST MANAGEMENT AND STUMP-TO-FOREST GATE CHAIN-OF-CUSTODY CERTIFICATION EVALUATION REPORT

WI Dept. of Natural Resources – County Forest Program
SCS-FM/COC-00083G

101 S. Webster St. PO Box 7921, Madison, WI 53707-7921

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CERTIFIED	EXPIRATION
12/31/2009	12/31/14

DATE OF FIELD AUDIT
08/12/11
DATE OF LAST UPDATE
3/16/12

Organization of the Report

This report of the results of our evaluation is divided into two sections. Section A provides the public summary and background information that is required by the Forest Stewardship Council. This section is made available to the general public and is intended to provide an overview of the evaluation process, the management programs and policies applied to the forest, and the results of the evaluation. Section A will be posted on the FSC Certificate Database (http://info.fsc.org/) no less than 30 days after issue of the certificate. Section B contains more detailed results and information for the use of by the FME.

FOREWARD

Cycle in annual surveillance audits			
☐ 1st annual audit	☒ 2nd annual audit	☐ 3rd annual audit	☐ 4th annual audit
Name of Forest Management Enterprise and abbreviation used in this report:			
Forest Management Enterprise (FME)	Wisconsin County Forest Program		

All certificates issued by SCS under the aegis of the Forest Stewardship Council (FSC) require annual audits to ascertain ongoing compliance with the requirements and standards of certification. A public summary of the initial evaluation is available on the SCS website www.scscertified.com.

Pursuant to FSC and SCS guidelines, annual/surveillance audits are not intended to comprehensively examine the full scope of the certified forest operations, as the cost of a full-scope audit would be prohibitive and it is not mandated by FSC audit protocols. Rather, annual audits are comprised of three main components:

- A focused assessment of the status of any outstanding conditions or Corrective Action Requests (CARs; see discussion in section 5.0 for a summary those CARs and their disposition as a result of this annual audit in the separate CAR report file);
- Follow-up inquiry into any issues that may have arisen since the award of certification or prior to the audit; and
- As necessary given the breadth of coverage associated with the first two components, an additional focus on selected topics or issues, the selection of which is not known to the certificate holder prior to the audit.

All items marked with an asterisk (*) are not required for FMUs that qualify as single SLIMFs.

Contents

Section A – Public Summary

1.0 General Information

1.1 Annual Audit Team

Auditor Name:	Brendan Grady	**Auditor role**:	Lead Auditor
Qualifications: **Qualifications**: Mr. Grady is the Program Manager for Forest Management Certification at SCS. Previously he served as a Certification Forester with SCS. In those roles, he has participated as a team member and leader in forest certification audits in the Western U.S. (California, Oregon, Washington, Idaho, Hawaii) and Europe (Sweden, Latvia, and Lithuania). Brendan has a B.S. in Forestry from the University of California, Berkeley, and a Juris Doctorate from the University of Washington School of Law. Brendan is a member of the State Bar of California, and was an attorney in private practice focusing on environmental law before returning to SCS.			
Auditor Name:	Mike Ferrucci	**Auditor role**:	Team Auditor
Qualifications: Mike Ferrucci is the SFI Program Manager for NSF – International Strategic Registrations and is responsible for all aspects of the firm's SFI Certification programs. He is qualified as a RAB-QSA Lead Auditor (ISO 14001 Environmental Management Systems), as an SFI Lead Auditor for Forest Management, Procurement, and Chain of Custody, as an FSC Lead Auditor Forest Management and Chain of Custody, as a Tree Farm Group Certification Lead Auditor, and as a GHG Lead Auditor. Mike has led Sustainable Forest Initiative (SFI) certification and precertification reviews throughout the United States. He has also led or participated in joint SFI and Forest Stewardship Council (FSC) certification projects in nearly one dozen states and a joint scoping or precertification gap-analysis project on tribal lands throughout the United States. He also co-led the pioneering pilot dual evaluation of the Lakeview Stewardship Unit on the Fremont-Winema National Forest. Mike Ferrucci has 30 years of forest management experience. His expertise is in sustainable forest management planning; in certification of forests as sustainably managed; in the application of easements for large-scale working forests, and in the ecology, silviculture, and management of mixed species forests, with an emphasis on regeneration and management of native hardwood species. Mike has conducted or participated in assessments of forest management operations throughout the United States, with field experience in 4 countries and 30 states. Mike has been a member of the Society of American Foresters for over 30 years. Mike is also a Lecturer at the Yale School of Forestry and Environmental Studies, where he has taught graduate courses and workshops in forest management, operations, professional forest ethics, private forestry, and financial analysis**.**			
Auditor Name:	JoAnne Hanowski	**Auditor role**:	Auditor
Qualifications: JoAnn M. Hanowski was a senior research fellow at the University of Minnesota-Duluth's Natural Resources Research Institute. She has considerable expertise evaluating the effects of forest			

management on wildlife habitat, and is currently working on research projects involving the response of birds to various forest management practices in stream and seasonal pond buffers and the development of indicators of forest and water health and sustainability in Minnesota and across the Great Lakes. She was a member of the forest bird technical team for the original GEIS and participated on the wildlife technical team that wrote forest management guidelines for Minnesota. She is a participant in a 14-year project for monitoring avian populations on the Chequamegon National Forest. She is currently a member of the riparian science technical committee that is investigating the effectiveness of Minnesota's current guidelines for forest management in riparian systems. She has published 64 peer-reviewed journal articles and over 75 reports in her 21 year tenure with the University of Minnesota. In 2005 JoAnn participated in the largest forest certification project ever conducted in the United States, the joint FSC/SFI certification of Minnesota's state lands. In 2006 and 2006 JoAnn contributed regional ecological expertise to the annual surveillance audits of the MN DNR's FSC and SFI certificates.

1.2 Total time spent on evaluation

A. Number of days spent on-site assessing the applicant:	3
B. Number of auditors participating in on-site evaluation:	3
C. Additional days spent on preparation, stakeholder consultation, and post-site follow-up:	1
D. Total number of person days used in evaluation:	10
(Line D = (Total number of days in Line A x Total number of auditors from Line B) + additional days from Line C.	

1.3 Standards Employed

Box 1.3.1. – Applicable FSC-Accredited Standards		
Title	**Version**	**Date of Finalization**
FSC-US Forest Management Standard	1.0	July 2010
FSC standard for group entities in forest management groups (FSC-STD-30-005)	V1-0	31 – August – 2009
All standards employed are available on the websites of FSC International (www.fsc.org), the FSC-US (www.fscus.org) or the SCS Forest Conservation Program homepage (www.scscertified.com/forestry). Standards are also available, upon request, from Scientific Certification Systems (www.scscertified.com).		

2.0 Annual Audit Dates and Activities

2.1 Annual Audit Itinerary, Activities, and Participants

Wednesday (August 10)
Barron County (Auditor: Mike Ferrucci)

Participants
Jeff Barkley, WDNR County Forest Specialist
Ken Symes, WDNR Forestry Certification Coordinator
John Cisek, Barron County Forest Administrator
Brad Johnson, WDNR Team Leader
Chris Rucihski, WDNR Forester
Kevin Morgan, Wildlife Biologist
Ryan Magana, WDNR Regional Ecologist

Sites
1. Sale #320, 30th Avenue Sale: Completed thinning harvested fall/winter 2009-2010
2. Bear Lake and Narrow Gauge Blocks, Demonstration Forest Tour Site: drove by several, stopped at Tour Site #C10, Red Pine Plantation
3. Sale #317, Deer Camp Sale: Completed thinning; also recreation access road into Kelly Lake
4. 29th Street parking lot and trail head (including sign) for the "Narrow Gauge Trails" horse trails
5. Sale #319, 13th Street Sale: Completed thinning and aspen patch clearcuts.
6. Sale #324: Completed harvest including pine thinning and aspen clearcut

Iron County (Auditors: JoAnn Hanowski & Brendan Grady)

Participants
Tyler Wicklund, Forester, Iron County Forestry
Tara Stuhr, Office Manager, Iron County Forestry
Jim Warren, Chief of Public Lands & Conservation Services Section, WDNR
C.E. Zinsmaster, WDNR Liaison
Joe Vairus, Forest Administrator, Iron County Forestry
Karl Linnemanstons, Forester Iron County Forestry
Gary Glonek, Forester, Iron County Forestry
Heather Berklund, Forester, WDNR
Colleen Matula, WDNR NOR Ecologist/ Silviculture
Jay Gallagher, WDNR
Todd Naas, WDNR – Ashland
Joe Schmidt, WDNR – Mellen
Carmen Hardin, WDNR – Rhinelander, Forest Hydrologist

Sites
1. Schonber Campground. Campground at the trail head of an ATV trail.
2. Revisit site from 2010. Mitigation of rutting was completed on the site by placing slash perpendicular to the slope of the skid trail.
3. Sale #2458. Aspen regeneration harvest with conifer retention by prescription. Considered visual aesthetics due to adjacency to highway and left a filter strip along the adjacent bog.

4. Sale #2424. Aspen regeneration harvest with a 100-200 foot buffer along the Turtle River. Mix of species and sizes of trees for retention.
5. Shay Dam Picnic Area. County owned/maintained dam and picnic area.
6. No number, marked sale in northern hardwood stand. Goal is to create canopy gaps around selected mast trees to create a multi-aged stand.
7. Sale #2368. This site is in the Pine Marten habitat study area and followed harvest guidelines for that species. All hemlock was left on site as well as a higher basal area. Harvest was primarily red maple.
8. Sale #2391. Aspen regeneration harvest with tamarack island and scattered residuals. Cedar/spruce lowland pockets were not harvested.

Thursday (August 11)

Burnett County (Auditors: Mike Ferrucci / SFI Oversight auditors)

Participants

Jeff Barkley, WDNR County Forestry Program
Jason Nichols, Burnett County Forestry Program Administrator
Mark Diesen, Burnett County Forestry Program Assistant Administrator
Tory Jeske, Burnett County Forestry Technician
Susan Ingalls, Burnett County Recreation Coordinator
Bob Hartshorn, WDNR Team Leader
Kyle Young, WDNR Liaison Forester
Nancy Crystal, Wisconsin DNR Biologist
Ryan Magana, WDNR NOR Regional Ecologist

Sites

1. Sale #2975-11Aspen CC with retention, active whole –tree chipping harvest as storm salvage; Interviewed Greg Litke- FISTA trained, had first aid kits and spill kit.
2. Sale #2931-10 Aspen CC and Red Pine Row Thinning; detailed discussion of landscape context and biodiversity benefits of the Burnett County timber program
3. Trail 41: ATV-only summer, snowmobile and ATV winter; graveled in May, ATV club grooms trails weekly
4. Tract 1-10 (not sold) Scrub oak CC with retention; adequate wildlife retention provided in sale specs.
5. Balsam Fire Lane and ATV Route: graded twice annually, mow edges every two year; confirmed County Forest Road Inspection Reports in Burnett County
6. Sale #2957-11 Planned Jack Pine CC, Aspen CC, RP Thinning; JP portion has been scarified; regen goal 500 tpa, track regeneration by year required inspections using paper system
7. Sale #2914-09 70 acre Jack Pine CC completed 2010, some portion scarified for natural regen
8. Dee Lake Fuels Break – burned or mowed every few years; maintained by WDNR
9. Sale #2976-11: Active salvage being conducted by Randy Crank, Crank Logging; JP had been thinned fall 2010 but July 2011 windstorm damaged significantly.
10. Sale #2894-09 73 acre JP thinning impacted by July 2011 storm, will need to salvage
11. Jack Pine Stand successfully regenerated mostly JP some oak with incomplete canopy closure 12 years post-harvest; biologists like habitat conditions including Big Bluestem and other open lands plants; this habitat supports the more intensively managed brush and barrens landscape

12. Tract 41-11 (not sold) Red pine stand thinned previously, slight to moderate damage from July 2011 windstorm, being salvaged. Interviewed Dwane Hamanm and Dave Shadrick, both FISTA-trained.
13. Sale #2896-09: Aspen and JP CC with retention scarified most areas pre-harvest; walked parts of 2 of 7 blocks, JP seedlings starting to develop
14. Sale #2888-09 Completed Red Pine Thinning; logger select every third tree, looked good

Sawyer County (Auditor: Brendan Grady)

Participants
Ken Symes, WDNR Forestry Certification Coordinator
Laine Stowell, WDNR Wildlife Biologist, Hayward
Jeff Steidel, Forester, Sawyer County Forestry
Pete Sievert, Assistant Forest Administrator, Sawyer County Forestry
David Todus, Forester, Sawyer County Forestry
Colleen Matula, WDNR NOR Ecologist/ Silviculture
Pete Wisdom, WDNR Forestry Team Leader– Hayward
Dolores Dobilas, Secretary/Bookkeeper, Sawyer County Forestry
Greg Peterson, County Forest Administrator, Sawyer County Forestry

Sawyer County Forestry Office – daily opening meeting, staff interviews, reviewed harvest rates, inventory system, sustainable harvest calculations. Discussed recreation opportunities on the county forest, interactions with recreational stakeholders, Inspected staff training records, Discussed training for BMPs. Reviewed logging contracts for required language.

Sites

1) Sale #2694-11 – Even aged regeneration of aspen, selection harvest of mixed hardwoods. Sale set up prior to green-tree retention guidelines going into effect, but clumps of non-aspen were left in the even-aged harvest, especially around a vernal pool. Silt fencing was installed on roads in order to protect small wetlands and streams. Active logging occurring, interviewed contractor and discussed safety protocols. Reviewed chain-of-custody procedures, inspected truck tickets.
2) Sale #2528-07 – Even-aged regeneration of aspen. Harvest had occurred in 2009, site showed strong regeneration. Discussed road maintenance issues en route to site, use of fords rather than culverts. Logging was done as whole-tree harvesting and chipping. Discussed nutrient cycling and guidelines on where whole-tree can occur. Large Riparian Management Zone in place next to Thornapple River. Single harvest unit was 168 acres, original stand had arisen after straight-line wind event. Discussed how future harvests would be smaller parcels to create more diversity on the landscape.
3) Sale 2672-10 – Uneven-aged hardwood stand. Silvilcultural method was selective thinning, designed to accelerate creation of uneven-aged stand. Strong age class of regeneration existed from previous thin 10 years prior, trees were marked in order to open this up. Discussed selection of wildlife and legacy trees. Retained trees showed little damage from harvesting. Had been an active site until recently. Soil required operation only in frozen or dry conditions,

contractor had pulled out the prior week after summer rains made the site too wet to work. Minor rutting was observed on skid trails, but not enough to trigger a violation of the BMPs.

4) Sale 2539-08 – mix of treatments: Aspen even-aged cut, hardwood selective thin, experiment in tamarack area. Harvest completed in 2009. Discussed road maintenance issues, small culvert on logging road had been overtopped since the site had been closed after the harvest. Culvert was still allowing water to flow. Site had already been identified and marked as a road maintenance issue to be remedied as part of transportation access plan. Even aged areas showed strong regeneration. Selective harvests showed minor amounts of damage. Experimental harvest of hardwoods in bog area adjacent to tamarack designed to increase population of tamarack. The tamarack had been showing signs of mortality. No effects in tamarack health from the harvest were visible yet. Discussed method for sharing silvicultural experiments like this one.
5) Sale 2653-10 – Mix of treatments – clearcut with retention in Aspen stand, shelterwood harvest in black ash stand, selection harvest in northern hardwood stand. Harvest area set up but not yet cut, an initial acre had been done, and then closed down due to wet conditions. Harvest blocks were adjacent to beaver pond, discussed new BMPs for wetlands. Discussed marking guidelines, and choosing retention trees in selection harvest stands.

Friday (August 12)

<u>Washburn County (Auditors: Mike Ferrucci, Brendan Grady, and JoAnn Hanowski)</u>

Mike Peterson, Washburn County Forest Administrator
Buck Pettingill, Washburn County Assistant Forest Administrator
Jim Pearson, WDNR Liaison Forester
Nancy Crystal, WDNR Wildlife Biologist, Spooner
Tom Duke, NOR Regional Forestry Leader, WDNR
Carmen Hardin, WDNR Forest Hydrologist
Colleen Matula, WDNR NOR Ecologist/ Silviculture
Brad Johnson, WDNR Forestry Team Leader
Jeff Barkley, WDNR County Forest Specialist
Ken Symes, WDNR Forestry Certification Coordinator

<u>Sites</u>

1. Tract 44-09: Partially completed including Aspen CC and Oak shelterwood, good coarse woody debris and retention, some forwarder ruts
2. Tract 9-07: Completed oak thinning and aspen CC with retention; walked ATV trail used during harvest, some minor erosion
3. Tract 32-08 Completed oak shelterwood, discussed regeneration methods and follow-up; ATV trail with gravel surface and a steep, recently upgraded section damaged by heavy rains, will be repaired again
4. Campground (lunch)
5. Tract 5-04 All-aged regeneration thinning; reviewed selection methods including gap creation, discussed loss of many saplings during logging due to large trees removed, adequate ash and some oak regeneration observed, but currently no maple and significant amounts of herbaceous vegetation, discussed regeneration challenges.

Friday August 12 (PM)

Closing meeting: oral presentation of initial findings, clarification of issues encountered during the audit.

3.0 Changes in Management Practices

There were no significant changes in the management and/or harvesting methods that affect the FME's conformance to the FSC standards and policies.

4.0 Annual Summary of pesticide and other chemical use

County	Commercial name of pesticide	Active ingredient	Quantity applied in 2010	Measure	Size of area treated in 2010 (acres)	Reason for use
Ashland	Roundup	Glyphosate	0.25	gal	1	Invasives treatment
	Roundup	Glyphosate	1.125	gal	4.5	Opening reestablishment
Barron	No pesticide use in 2011			gal		
Bayfield	Accord Concentrate	Glyphosate	114.6	gal	306	Red Pine Site Prep
	Oust XP	Sulfometuron methyl	19	gal	306	Red Pine Site Prep
	Entrée	Surfactant	23.88	gal	306	Red Pine Site Prep
	Accord XRT	Glyphosate	135.5	gal	278	Red Pine Site Prep
	Oust Extra	Sulfometuron methyl	26	gal	278	Red Pine Site Prep
	Chopper Gen II	Imazapyr	21	gal	153	Red Pine Site Prep
	Forestry Garlon	Triclopyr	28	gal	142	Pine Barrens Habitat Establishment
	Liberate	Surfactant	21.72	gal	278	Red Pine Site Prep
Chippewa	Cornerstone Plus	glyphosate	0.25	gal	.5 ac. (linear)	Eradicate garlic mustard (invasive)
Clark	Arsenal AC	Isopropylamine of Imazapyr	27	lbs.	81	Reforestation site pre & conifer release
	Accord Concentrate	Glyphosate	300	lbs.	93	Reforestation site pre, conifer release & Veg control in Parks
	Transline	Clopyralid	3	lbs.	10	Invasive Plant control

	Milestone	Triisopropanolammonium salt of 2-pyridine	1	lbs.	10	Invasive Plant control
	Tordon K	picloram	1	lbs.	8	Invasive Plant control
	Pathway	picloram	2	lbs.	0.5	Cut stump - control re-sprouting
	Stalker	Isopropylamine salt of Imazapyr	0.25	lbs.	0.5	Cut stump - oak wilt control
Douglas	No pesticide use in 2010					
Eau Claire	Stalker Cellutreat	Isopropylamine salt of Imazapyr Disodium Octaborate Tetrahydrate	0.25 5	lbs. gal	0.5 30	Cut stump - Control re-sprouting Annosum root rot prevention
Florence	No pesticide use in 2010					
Forest	No pesticide use in 2010					
Iron	No pesticide use in 2010					
Jackson	Roundup	Glyphosate	2	gal	3	Bike trail vegetation control
Juneau	Roundup	Glyphosate	0.05	gal	0.1	Bass Hollow Park - apple tree veg control
Lincoln	Cornerstone Plus Oust XP Amine 2,4-D	Glyphosate Sulforeturon methyl 2-4D dimethylamine ester	0.3 0.1 0.008	gal gal gal	8 9 1	Invasive species (garlic mustard) control Invasive species (garlic mustard) control Black locust control
Oconto	Cellutreat	Disodium Octaborate Tetrahydrate	135	gal	527	Annosum root rot prevention
Price	Killzall II	Glyphosate	.11 (14 fl oz	gal	2	Cirsium palustre (invasives control)
	Element 4	Triclopyr	.07 (9 fl. oz.)	gal	0.7	Rhamnus cathartica & Lonicera spp. (Invasives control)
Sawyer	No pesticide use in 2010					

Taylor	No pesticide use in 2010					
Washburn	Spike 20P	Tibuthiuron	52	lbs.	82.5	Woody vegetation control in Wildlife openings
Wood	No pesticide use in 2010					

5.0 Corrective Action Requests (CARs) and Observations (OBSs)

5.1 Open Findings from Previous Audits

TO BE COMPLETED BY SCS REPRESENTATIVE

CAR/OBS Number (e.g. 1, 2, …)	**2010.1**

Select one:		**Major CAR**	x	**Minor CAR**		**Observation**

Site CAR/OBS issued to (where more than one site)	

Deadline for Corrective Action by FME

	3 months from above Date of Issuance
x	Next audit (surveillance or re-evaluation)
	Pre-condition to certification
	Other deadline (specify):

Standard and Requirement Reference	FSC Lake States Regional Standard; Indicator **6.5.b**

NON-CONFORMITY

According to Indicator 6.5.b. *At a minimum, implementation of BMPs and other resource protection measures will result in the following:*

- *Roads without a weather resistant surface (e.g., soil, dirt, or native-surfaced roads) are used only during periods of weather when conditions are favorable to minimize road damage, surface erosion, and sediment transport.*
- *Failed drainage structures or other areas of active erosion caused by roads and skid trails are identified, and measures are taken to correct the drainage problems and stabilize erosion.*

Additionally, according to 5.3.c. Harvest practices minimize residual stand damage. *For example: Soil compaction, rutting, and erosion are minimized.*

During the 2010 audit we observed BMP non-conformances with one or more of the above requirements of Indicator 6.5.b. and 5.3.c at Chippewa and Iron Counties.

- Chippewa Forest- Camp Lake road was unraveling in places and some sedimentation into adjacent water was observed.
- Iron County Tract # 28-09 located in Section 5, T43N, R3E (Town of Mercer) along Moose Lake Road did not have harvest system layout that minimized impacts to wet soils or to small wetland pockets. Additionally Tract 18-09 had a clause in the contract that harvest operations would only occur on dry or frozen conditions. The site was visited during a very wet period in August, was actively being logged, and had an area of significant rutting.

TO BE COMPLETED BY SCS REPRESENTATIVE

REQUESTED CORRECTIVE ACTION *(or Observation)*

Applicable WCFP Counties must take action to correct BMP violations noted in the non-conformance section above (where mitigation is appropriate- i.e., repairing ruts is often not pragmatic).

SCS REVIEW / ACCEPTANCE OF CORRECTIVE ACTION
(Describe conclusion in detail)

The specific skid trail erosion site visited in Iron County during the 2010 audit was revisited. Mitigation had taken place in the form of slash being placed across the trail to protect it during operations and to reduce erosion on the steeper part of the trail.

At a larger scale, new Wisconsin Best Management Practices guidelines were published. In particular, updates were made to guidelines for operating near wetlands. Formal trainings on the new guidelines have been held, and at a minimum the new guidelines have all been discussed with logging contractors in the field by county foresters. In addition, a soil compaction study is also being implemented on County and State lands in order to evaluate effectiveness of the new standards.
These actions are sufficient to warrant closure of this particular CAR, although conformance to the BMPs was again a focus of the 2011 audit, and likely will be in the future.

X CLOSED

UPGRADED TO MAJOR

OTHER DECISION (refer to description above)

SCS Representative Name and Title (CAR/OBS reviewer)	Date of Acceptance of Corrective Action
Brendan Grady	8/12/11

Press Enter twice below table to leave a space, then copy and paste table below for each CAR/OBS

TO BE COMPLETED BY SCS REPRESENTATIVE

CAR/OBS Number (e.g. 1, 2, …)	**2010.2**

Select one:		**Major CAR**	x	**Minor CAR**		**Observation**

Site CAR/OBS issued to (where more than one site)	

Deadline for Corrective Action by FME

	3 months from above Date of Issuance
x	Next audit (surveillance or re-evaluation)
	Pre-condition to certification
	Other deadline (specify):

Standard and Requirement Reference	FSC-STD-30-005; Criterion 8.1

NON-CONFORMITY

WCFP does not annually monitor a sample of group members to confirm continued conformance with all the requirements of the applicable FSC Standard in accordance with FSC-STD-30-005- Criterion 8.1.

The Group entity shall implement a documented monitoring and control system that includes at least the following: ii. Regular (at least annual) monitoring visits to a sample of Group members to confirm continued compliance with all the requirements of the applicable Forest Stewardship Standard, and with any additional requirements for membership of the Group.

REQUESTED CORRECTIVE ACTION *(or Observation)*

WCFP must develop and implement a documented procedure to ensure internal monitoring of group members covers all the requirements of the applicable FSC Standard.

TO BE

SCS REVIEW / ACCEPTANCE OF CORRECTIVE ACTION
(Describe conclusion in detail)

The WCFP increased the intensity of their internal audit program so that it covered requirements of the entire standard, rather than focusing on non-conformances identified by external auditors, as had previously been the case. A new County Forest Internal FSC Audit Checklist was created, which lists audit questions and topics according to the FSC standard. In addition, a schedule was laid out for visiting 9-10 counties each year (in 2011 scheduled to include Iron, Taylor, Washburn, Clark, and Eau Claire)

The actions taken by WCFP are sufficient to close this CAR. However, there was some concern at the time of the audit that WCFP may have logistical difficulty in completing the 2011 planned internal audits, as the year was half over and none had yet been completed. Subsequent comments from WCFP indicate that internal audits are being conducted as scheduled. This issue will be reviewed in future audits to ensure that the internal audit sampling requirements are met.

X CLOSED

UPGRADED TO MAJOR

OTHER DECISION (refer to description above)

SCS Representative Name and Title (CAR/OBS reviewer)	Date of Acceptance of Corrective Action
Brendan Grady	8/12/11

Press Enter twice below table to leave a space, then copy and paste table below for each CAR/OBS

TO BE COMPLETED BY SCS REPRESENTATIVE

CAR/OBS Number (e.g. 1, 2, …)	**2010.1**

Select one:		**Major CAR**		**Minor CAR**	x	**Observation**

Site CAR/OBS issued to (where more than one site)	

Deadline for Corrective Action by FME

	3 months from above Date of Issuance
x	Next audit (surveillance or re-evaluation)
	Pre-condition to certification
	Other deadline (specify):

Standard and Requirement Reference	FSC Lake States Regional Standard; Indicator **9.3.a**

NON-CONFORMITY

Ashland County is actively managing some of its hemlock HCVF areas. Informal observations suggest that the silvicultural activities are successfully regenerating hemlock and thus consistent with the requirement to maintain/perpetuate HCVF. However, timber harvests in these HCVF areas are occurring without a specific plan based on and linked to monitoring data (e.g. releve plots).

REQUESTED CORRECTIVE ACTION *(or Observation)*

For areas where HCVF is being actively managed, timber sale 2460 forms should include an explicit discussion of how HCVF has been addressed. Additionally, WCFP should ensure that there is a mechanism to link monitoring results of HCVF to management decisions.

TO BE COMPLETED BY SCS DELEGATE

SCS REVIEW / ACCEPTANCE OF CORRECTIVE ACTION
(Describe conclusion in detail)

This observation was not reviewed in detail, as no HCVF sites with active management were visited during the 2012 audit. Thus the observation will be kept open for future audits.

	CLOSED UPGRADED TO MAJOR X OTHER DECISION (refer to description above)	
	SCS Representative Name and Title (CAR/OBS reviewer) Brendan Grady	Date of Acceptance of Corrective Action 8/12/11

5.2 Findings as a result of the 2011 Audit

TO BE COMPLETED BY SCS REPRESENTATIVE

CAR/OBS Number (e.g. 1, 2, …)	**2011.1**

Select one:		**Major CAR**	x	**Minor CAR**		**Observation**

Site CAR/OBS issued to (where more than one site)	

Deadline for Corrective Action by FME

	3 months from above Date of Issuance
x	Next audit (surveillance or re-evaluation)
	Pre-condition to certification
	Other deadline (specify):

Standard and Requirement Reference	FSC US FM STD; 4.2.b

NON-CONFORMITY *(or Background/ Justification in the case of Observations)*

(Describe and provide objective evidence)

Review of timber sale contracts in Iron, Sawyer, and Washburn Counties did not show consistent inclusion of safety requirements. Although contracts contain training requirements, such as FISTA training, and the requirement to carry workman's compensation insurance, not all contracts specifically included safety requirements. For example, contracts in Sawyer and Washburn did not make specific reference to safety requirements or OSHA. Iron county have specific clauses requiring that contractors follow the OSHA Standard of Hazardous Communication regulations. However even in this case the contract specifically cites 29 CFR 1910.1200, which pertains to hazardous waste management, not the section of OSHA regulations covering logging operations (29 CFR 1910.266).

REQUESTED CORRECTIVE ACTION *(or Observation)*

County Forests must ensure that contracts or other written agreements include safety requirements.

TO BE COMPLETED BY SCS REPRESENTATIVE

CAR/OBS Number (e.g. 1, 2, …)	**2011.2**

Select one:		**Major CAR**		**Minor CAR**	x	**Observation**

Site CAR/OBS issued to (where more than one site)	

Deadline for Corrective Action by FME

	3 months from above Date of Issuance
x	Next audit (surveillance or re-evaluation)
	Pre-condition to certification
	Other deadline (specify):

Standard and Requirement Reference	FSC US FM STD; 6.3.a.3

NON-CONFORMITY *(or Background/ Justification in the case of Observations)*

(Describe and provide objective evidence)

Old growth definitions had not been updated to the new Type I and Type II definitions described in the FSC-US standard. However, this finding is only an observation, since a review of identified old-growth areas using the WisFRS system did not result in any areas without management protections in place that would provide equivalent protection.

REQUESTED CORRECTIVE ACTION

Old growth definitions and protection measures should be updated, in order to guard against the possibility that newly identified areas or changes in management practices do not lead to a non-conformance.

TO BE COMPLETED BY SCS REPRESENTATIVE

CAR/OBS Number (e.g. 1, 2, …)	**2011.3**

Select one:		**Major CAR**	x	**Minor CAR**		**Observation**

Site CAR/OBS issued to (where more than one site)	

Deadline for Corrective Action by FME

	3 months from above Date of Issuance
x	Next audit (surveillance or re-evaluation)
	Pre-condition to certification
	Other deadline (specify):

Standard and Requirement Reference	FSC US FM STD; 6.3.f

NON-CONFORMITY *(or Background/ Justification in the case of Observations)*

(Describe and provide objective evidence)

Management plans have not been updated to include the definition of legacy trees, and the requirement that they not be harvested. Although interviews with DNR staff indicated that they were aware of the definition, and that a draft policy addressing the issue was being prepared, it was not yet in effect. In addition, interviews with field staff resulted in varying interpretations as to what constituted a legacy tree, indicating that there is still uncertainty about this new requirement.

REQUESTED CORRECTIVE ACTION *(or Observation)*

Management plans, or other appropriate documents, must ensure that legacy trees, as defined by the FSC-US Forest Management Standard, are not harvested.

TO BE COMPLETED BY SCS REPRESENTATIVE

CAR/OBS Number (e.g. 1, 2, …)	**2011.4**

Select one:

	Major CAR		**Minor CAR**	**x**	**Observation**

Site CAR/OBS issued to (where more than one site)	

Deadline for Corrective Action by FME

	3 months from above Date of Issuance
x	Next audit (surveillance or re-evaluation)
	Pre-condition to certification
	Other deadline (specify):

Standard and Requirement Reference	FSC US FM STD; 8.3.a

BACKGROUND/JUSTIFICATION

After the field portion of the audit, SCS received a complaint that county forests (Clark County in particular) had been selling FSC material without including the requisite information (Certificate code and FSC Claim), on trip tickets or other shipping documentation. In this particular case the code was included but the claim "FSC Pure" was not. In addition, FSC has recently updated the title of this product claim to "FSC 100%," which will need to be used on chain-of-custody documentation beginning in October 2012.

County forest program staff provided evidence that corrective actions had already been implemented regarding COC procedures, including the use of stamps containing the FSC claim on all trip tickets, and a standard letter sent from county forests to their wood purchasers, detailing the required information. However in this case the trip ticket in question did not contain the stamp, and the purchaser did not have a copy of the letter. Based on this, the finding has been lowered from a CAR to an observation, as corrective actions were already in effect, and a lapse in the system occurred.

OBSERVATION

All County Forests selling FSC certified product must ensure that shipping documentation includes the appropriate FSC claim being made.

6.0 Stakeholder Comment*

SCS conducts stakeholder outreach as part of annual audits in order to assess on-going conformance to the applicable FSC standards. Stakeholder consultation activities can include telephone calls, written letters, emails or consultation in the field. The results of stakeholder consultation activities are summarized below. Where a stakeholder comment has triggered a subsequent investigation during the evaluation, the corresponding follow-up action and conclusions from SCS have been noted.

Box 6.1 – Summary of Stakeholder Comments and Responses from the Team Where Applicable	
Stakeholder comments	**SCS Response**
Economic concerns	
Clark County was not including required information necessary to maintain Chain-of-Custody requirements.	After investigation, OBS 2011.4 was issued in response to this comment.
Social concerns	
None received	
Environmental concerns	
None received	

7.0 Certification Decision

Box 7.1 Surveillance Decision	
The certificate holder has demonstrated continued overall conformance to the applicable Forest Stewardship standards. The SCS annual audit team recommends that the certificate be sustained, subject to subsequent annual audits and the FME's response to any open CARs.	**Yes** ☒ **No** ☐

8.0 Current list of Non-SLIMF FMUs (multiple FMU and group certificates only)

Name (County)	**Size (ac)**	**Contact information**	**Latitude/ longitude of Non-SLIMF FMUs**	
Ashland	40,083			
Barron	16,024			

Bayfield	169,438			
Chippewa	33,893			
Clark	132,851			
Douglas	277,072			
Eau Claire	52,292			
Florence	36,709			
Forest	11,615			
Iron	174,267			
Jackson	120,820			
Juneau	15,115			
Lincoln	100,845			
Oconto	43,661			
Price	92,267			
Sawyer	115,200			
Taylor	17,600			
Washburn	149,023			
Wood	37,606			

Section B - Appendices

Appendix 1 – List of FMUs selected for evaluation (CONFIDENTIAL)

☐ FME consists of a single FMU – No further action required
☒ FME consists of multiple FMUs – See table below, which applies to multiple FMU and group management evaluations, but is inapplicable if the scope of the evaluation is a single FMU.

Selection of FMUs for evaluation

According to the FSC definition (see FSC-STD-01-002 V1-0), a Forest Management Unit (FMU) is "a clearly defined forest area with mapped boundaries, managed by a single managerial body to a set of explicit objectives which are expressed in a self-contained multi-year management plan." As long as it meets FSC's definition, any single FMU may range in size from smaller than 20 ha to over 1,000,000 ha.

SCS classifies FMUs included in the scope of the evaluation as sets of 'like' FMUs for the purpose of sampling. 'Like' FMUs typically are similar in forest type, size, and applicable FSC standards. A group or multiple FMU evaluation may consist of one or more sets of 'like' FMUs. At times, SCS may select an FMU for evaluation due to a pertinent stakeholder issue, pending corrective actions or its proximity to another sampled FMU.

These sets are selected to minimize variability within each set in terms of:

a) Forest types (natural/ semi-natural vs. plantation);
b) FMU size class – small, medium, and large FMUs (see Annex 1 of FSC-STD-20-007); and
c) Applicable national or regional Forest Stewardship Standard.

The results of this analysis of a) – c) are detailed below in terms of Non-SLIMF and SLIMF FMUs. SCS determines sampling intensity prior to conducting all evaluations. In special cases, such as the high presence of HCVFs, controversial forest operations, stakeholder issues, RMUs or so-called mega groups, SCS follows section 5.3 and Annex 1 FSC-STD-20-007 and other FSC guidance as appropriate.

Group Management certificates

In the case of forest management groups comprised of SLIMF and non-SLIMF FMUs, SCS samples non-SLIMF and SLIMF FMUs as separate strata. Groups that consist all or in part of 'small' SLIMF FMUs may be sampled using the Resource Management Unit (RMU) concept if they meet the definition of RMU (an RMU is a set of FMUs managed by the same managerial body). Sampling in group management programs is carried out in accordance to section 5.3 and Annex 1 of FSC-STD-20-007.

Multiple FMU

For each set of 'like' FMUs thus identified in a) – c) above for multiple FMU certificates, SCS selects a *minimum* number of FMUs for evaluation (X) as specified in 5.3.2 of FSC-STD-20-007 by applying the formula $X = 0.8 * \sqrt{y}$ (y = all FMUs in the scope of certification). NOTE: the number of units calculated (X) has to be rounded to the upper whole number to determine the number of units to be sampled.

Non-SLIMF FMUs

Natural/ Semi-Natural Forest Management		
Name	**Rationale for selection (check all that apply)**	
Iron	☐ Random sample	☐ Near other sampled FMU
	☐ Stakeholder issue	☒ Other: Follow-up on CAR

Sawyer	☐ Random sample	☒ Near other sampled FMU
	☐ Stakeholder issue	☐ Other:
Washburn	☐ Random sample	☒ Near other sampled FMU
	☐ Stakeholder issue	☐ Other:
Burnett	☐ Random sample	☒ Near other sampled FMU
	☐ Stakeholder issue	☐ Other:
Barron	☐ Random sample	☒ Near other sampled FMU
	☐ Stakeholder issue	☐ Other:

Appendix 2 – Evaluation of Management Systems (CONFIDENTIAL)*

The surveillance audit was performed by SCS August 10-12, 2011 by an audit team headed by Brendan Grady, Lead Auditor. The team included JoAnn Hanowski- Wildlife specialist and Mike Ferrucci- Forester. The process included the assembly and review of audit evidence consisting of documents, interviews, and on-site inspections of ongoing or completed forest practices. Documents describing these activities and lists of management activities were provided to the auditors in advance, and a sample of the available field sites was designated by the audit team for review. The selection of field sites for inspection was based upon the risk of environmental impact, special features, past non-conformances/observations, and other factors. During the audit, the audit team reviewed a sample of the available written documentation as objective evidence of FSC conformance. Documents that were reviewed during this audit included management plans, policy and procedure documents, timber sale inspection forms, chemical use records, among other policies, procedures and records.

At the start of the audit, each audit team member was assigned a subset of the relevant indicators for this audit. During deliberation, the audit team used a consensus approach to determine whether or not there was conformance with each of the indicators being assessed during this audit. The audit team also selected and interviewed contract loggers and County and DNR employees within the organization to assess conformance with the FSC standards.

Appendix 3 – Stakeholder analysis (CONFIDENTIAL)*

3.1 Stakeholder list (confidential)

List of FME Staff Consulted

In-person interviews were conducted with all participants in section 2.1 of the report.

List of other Stakeholders Consulted

Name/ Title	Organization	Contact	Consultation method
Jeff Van Dorn	Van Dorn Logging		Field Consultation

1.2 Stakeholder review, complaints, and resolution

Box 3.2.1 – Summary of Stakeholder Comments and Responses from the Team Where Applicable	
FME has not received any stakeholder complaints and the annual audit uncovered no known disputes since the previous evaluation. SCS has not received any complaints from stakeholders regarding its performance or treatment of FME's management system.	☒

Appendix 4 – Additional Audit Techniques Employed (CONFIDENTIAL)*

The audit team did not employ any additional audit techniques for this annual surveillance audit.

Appendix 5 – Changes in Certification Scope

Changes in Certificate Scope					
Check all applicable changes and include updated information					
☒	Organization name	WI Dept. of Natural Resources – County Forest program			
☒	Contact person	Name:	Jeff Barkley		
		Telephone:	608-264-9217	e-mail:	Jeffrey.barkley@WI.gov
☐	FSC salesperson	Name:			
		Telephone:		e-mail:	
☐	Website address	http://dnr.wi.gov/forestry/			
Certificate information					
☒	Certificate Type	☐ Single FMU	☒ Multiple FMU		
		☐ Group			
☐	SLIMF *if applicable*	☐ Small SLIMF certificate	☐ Low intensity SLIMF certificate		
		☐ Group SLIMF certificate			
☒	Group Members *if applicable*	*# of Group Members - 19*			
☒	Number of FMUs in scope of certificate	*# 19*			
Total forest area in scope of certificate which is:					
☐	**privately managed**[1]	*ha or ac*			
☐	**state managed**	*ha or ac*			

[1] The category of 'private management' includes state owned forests that are leased to private companies for management, e.g. through a concession system.

☒	**community managed**[2]		*ha or ac 1,636,390 acres (Jt. Management with State of WI.)*	
Number of FMUs in scope that are:				
☒	less than 100 ha in area	#	100 - 1000 ha in area	#
	1000 - 10 000 ha in area	# 4	more than 10 000 ha in area	# 15
Total forest area in scope of certificate which is included in FMUs that:				
☐	are less than 100 ha in area		**#**	
☐	are between 100 ha and 1000 ha in area		#	
☐	meet the eligibility criteria as *low intensity* SLIMF FMUs		#	
☐	**Division of FMUs into manageable units:**			
	Describe any changes as to how FMUs are divided into manageable areas, units or stands. - NONE			

Social Information		
Number of forest workers (including contractors) working in forest within scope of certificate (differentiated by gender):		
1401 # of male workers	**57 -** # of female workers	
Number of accidents in forest work since last audit	**Serious**	**Fatal**
	# 2	# 0

Production Forests		
Timber forest products		
☒	Total area of production forest (i.e. forest from which timber may be harvested)	*ha or ac* **1,320,478 acres (eligible for management)**
☒	Area of production forest classified as 'plantation'	*ha or ac* **0**
☒	Area of production forest regenerated primarily by replanting or by a combination of replanting and coppicing of the planted stems[3]	*ha or ac* **125,547 ac.** (all PR, SW & 2/3 of PJ)
☒	Area of production forest regenerated primarily by natural regeneration, or by a combination of natural regeneration and coppicing of the naturally regenerated stems	*ha or ac* **1,194,931 acres**
☒	The sustainable rate of harvest (usually the AAC where available) of	*m^3 or bd ft by species*

[2] A community managed forest management unit is one in which the management and use of the forest and tree resources is controlled by local communities.

[3] The area is the *total* area being regenerated primarily by planting, *not* the area which is replanted annually. NB this area may be different to the area defined as a 'plantation' for the purpose of calculating the Annual Accreditation Fee (AAF) or for other purposes.

	commercial timber (cubic meters of round wood)	**42,747 acres annually (Area control)**
Non-timber forest products		
☒	Area of forest protected from commercial harvesting of timber and managed primarily for the production of NTFPs or services	*ha or ac* **0** (see Non-timber conservation – 40,769 forested acres are excluded from harvesting)
☒	Approximate annual commercial production of non-timber forest products included in the scope of the certificate, by product type	*ha or ac; kg; or some other quantity per ha or ac* **Spaghnum moss – 20,000 bales annually (0391b sub-product)**

Species and product categories in scope of joint FM/COC certificate				
☐	***Scientific/ Latin Name* (Common/ Trade Name)**			
☐	**FSC Product Classification**			
	Product class		**Product type**	**Product sub-type & notes**
	☒	031 Logs/ Wood in the rough	0311 Logs of coniferous wood	8720 MBF + 453,733 cords (472,917 cd. equivalents)
	☒	031 Logs/ Wood in the rough	0312 Logs of non-coniferous wood	1294 MBF + 120,271 cords (123,928 cd. eqivalents)
	☒	031 Logs/ Wood in the rough	0313 Fuel wood, in logs/other non proc forms	2295 cds. (fuelwood)
	☐	3451 Wood charcoal	34510 Wood charcoal	
	☐	311 Wood, sawn or chipped lengthwise, sliced or peeled, of a thickness exceeding 6 mm; railway or tramway sleepers (cross-ties) of wood, not impregnated	3110 Wood, sawn or chipped lengthwise, sliced or peeled, of a thickness exceeding 6 mm; railway or tramway sleepers (cross-ties) of wood, not impregnated	
	☒	312 Wood continuously shaped along any of its edges or faces; wood wool; wood flour; wood in chips or	3123 Wood in chips or particles	2700 tons (wood chips <4”)

		particles		
	☒	Non-Timber Forest Products	Game, deer	~20,000 bales moss (0391b) and 50 tons boughs (0391a)
	☐	Non-Timber Forest Products	032 Natural gums	0321 Natural rubb
	☐	Non-Timber Forest Products	Berries	N/A
For a full list of FSC product classes, product types, and product sub-types, see FSC-STD-40-004a (Version 1-0) EN – FSC Product Classification.				

Conservation Areas		
☒	Area of forest and non-forest land protected from commercial harvesting of timber and managed primarily for conservation objectives	*ha or ac* **304,785 acres** (40,769 forested & remainder non-forest)

High Conservation Value Forest/ Areas				
High Conservation Values present and respective areas				
	Code	**HCV Type[4]**	**Description & Location**	**Area**
☒	HCV1	Forest areas containing globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia).	Barrens – Eau Claire, Clark, Jackson Old growth pine relics – Juneau, Taylor, Forest Oak Savanna – Clark, Washburn	2233 acres
☒	HCV2	Forest areas containing globally, regionally or nationally significant large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance.	St. Croix River Scenic easements (Nat.Scenic River) Penokee Range – Iron Silent Wood Benchmark For. - Washburn	2713 acres
☒	HCV3	Forest areas that are in or contain rare, threatened or endangered ecosystems.	Assorted bogs, wetland communities, hemlock areas, fens, kettle lakes – Several counties	36,020 acres
☒	HCV4	Forest areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).	Migratory Bird area – Clark Nemadji Floodplain forest – Douglas Potato River Falls – iron	619 acres
☒	HCV5	Forest areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).	Ruffed Grouse Mgt. Areas – Wood, Washburn, Clark	2060 acres
☒	HCV6	Forest areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).	None	0

[4] High conservation values should be classified following the numbering system given in the ProForest High Conservation Value Forest Toolkit (2003) available at www.ProForest.net or at www.wwf.org

☒	**Total Area of forest classified as 'High Conservation Value Forest'**	*ha or ac* **43,645 ac.**
ANY REDUCTION IN HCVF AREA OR CHANGES IN HCVF/HCVA CLASSIFICATION MUST BE REVIEWED BY SCS TO ENSURE COMPLIANCE WITH FSC CONVERSION POLICIES AND THAT ANY REDUCTION IS THE RESULT OF THE SALE OF LANDS TO OTHER FORESTRY COMPANIES, CONSERVATION GROUPS, STATE AGENCIES, ETC.		

Appendix 6 – Pesticide derogations

No approved pesticide derogations for WDNR.

Appendix 7 – Detailed observations (CONFIDENTIAL)

Evaluation year	**FSC P&C Reviewed**
2009	All – Recertification Evaluation
2010	P. 1 and P.2;
2011	Criteria 1.2, 1.5, 1.6, 2.3, 3.2, 4.2, 4.4, 5.5, 5.6, 6.1, 6.2, 6.3, 6.4, 6.5, 6.6, 6.9, 7.1, 8.1, 8.2, and 9.4
2012	
2013	
2014	

C= Conformance with Criterion
C/NC= Overall Conformance with Criterion, but there are Indicator non-conformances
NC= Non-Conformance with Criterion

FSC-US Forest Management Standard (v1.0)

Approved by FSC-IC, July 8, 2010

REQUIREMENT	**C/NC**	**COMMENT/CAR**
P1 Forest management shall respect all applicable laws of the country in which they occur, and international treaties and agreements to which the country is a signatory, and comply with all FSC Principles and Criteria.		
***C1.2. All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid**.	C	
1.2.a. The forest owner or manager provides written evidence that all applicable and legally prescribed fees, royalties, taxes and other charges are being paid in a timely manner. If payment is	C	As county land, matters related to taxes are largely not applicable. However, the county forest programs are required to provide 10% of stumpage revenue to the townships encompassing the land in their county forests. Interviews with staff and county

beyond the control of the landowner or manager, then there is evidence that every attempt at payment was made.		representatives indicated that this payment was made in a timely manner. Written evidence that payments are made is available.
***C1.5. Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.**	C	
1.5.a. The forest owner or manager supports or implements measures intended to prevent illegal and unauthorized activities on the ***Forest Management Unit*** (FMU).	C	Some County forests employ recreational officers who have the chief responsibility for controlling illegal recreational activities on the FMUs. In addition, local law enforcement also assists in curbing illegal activities on the FMU. The forests also employ such measures as sign posting, road closure, and boundary markings prior to harvesting.
1.5.b. If illegal or unauthorized activities occur, the forest owner or manager implements actions designed to curtail such activities and correct the situation to the extent possible for meeting all land management objectives with consideration of available resources.	C	County forest programs work regularly with the justice side of county government to police county land and enforce laws when violations do occur.
***C1.6. Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.**	C	
1.6.a. The forest owner or manager demonstrates a long-term commitment to adhere to the FSC Principles and Criteria and FSC and FSC-US policies, including the FSC-US Land Sales Policy, and has a publicly available statement of commitment to manage the FMU in conformance with FSC standards and policies.	C	All County Forests have made commitments to FSC through County Board Resolutions, which are included in the 15-year plans.
1.6.b. If the certificate holder does not certify their entire holdings, then they document, in brief, the reasons for seeking partial certification referencing FSC-POL-20-002 (or subsequent policy revisions), the location of other managed forest units, the natural resources found on the holdings being excluded from certification, and the management activities planned for the holdings	C	Each of the county forests reported the limited amount of lands they hold outside of the certificate, and the reason for each. In general the excluded lands have all come into ownership by the county forests through tax delinquency, but are lands unsuitable for timber management, such as highway right of ways, hospitals and other municipal buildings, forestland dedicated primarily to recreation or

being excluded from certification.		wildlife preservation, and areas of forest that are outside of blocked county properties and therefore difficult to manage logistically for timber.
1.6.c. The forest owner or manager notifies the Certifying Body of significant changes in ownership and/or significant changes in management planning within 90 days of such change.	C	The Certificate is managed centrally by WI DNR, who is in regular communication with SCS over certification issues.
P2 Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.		
***C2.3. Appropriate mechanisms shall be employed to resolve disputes over tenure claims and use rights. The circumstances and status of any outstanding disputes will be explicitly considered in the certification evaluation. Disputes of substantial magnitude involving a significant number of interests will normally disqualify an operation from being certified.**	C	
2.3.a. If ***disputes*** arise regarding tenure claims or use rights then the forest owner or manager initially attempts to resolve them through open communication, negotiation, and/or mediation. If these good-faith efforts fail, then federal, state, and/or local laws are employed to resolve such disputes.	C	There are no significant disputes over tenure and use rights. All land managed under the certificate is government owned. County forests occasionally deal with encroachment issues, such as houses or structures being built on county land. Disputes of this nature are resolved locally if possible. In such situations usually the county negotiates a sale of the land, and the revenue is put into a trust to acquire more forestland. Lands removed from County Forest designation require a formalized process to ensure public benefit is retained. The court system is used when necessary. In Washburn county a recent situation was described where the county had to sue an encroacher, but lost on the grounds that the area had been adversely possessed.

2.3.b. The forest owner or manager documents any significant disputes over tenure and use rights.	C	Significant disputes over tenure and use rights result in use of the court system, and are adequately documented through this process.
P3 The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected.		
***C3.2. Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.**		
3.2.a. During management planning, the forest owner or manager consults with American Indian groups that have legal rights or other binding agreements to the FMU to avoid harming their resources or rights.	C	County forest managers actively engage with tribes during management planning when possible, as the level of response from tribes is typically low. 15-year plans contain sections governing treaty rights, allowing any treaty right participant to gather firewood, tree bark, maple sap, lodge poles, boughs, marsh hay, and other non-timber forest products at no cost. In Iron county, the county also owns land that is surrounded by Chippewa reservation land. Forest managers have done outreach with the tribe to provide technical assistance on harvesting should the tribe choose.
3.2.b. Demonstrable actions are taken so that forest management does not adversely affect tribal resources. When applicable, evidence of, and measures for, protecting tribal resources are incorporated in the management plan.	C	Tribal groups did provide comments on the 15-year management plans, typically to ensure that treaty rights were protected. The State Archaeologist is active in identifying cultural resources, training land managers in their identification, and advising on the appropriate protections.
P4 Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.		
***C4.2. Forest management should meet or**	C	

exceed all applicable laws and/or regulations covering health and safety of employees and their families.		
4.2.a. The forest owner or manager meets or exceeds all applicable laws and/or regulations covering health and safety of employees and their families (also see Criterion 1.1).	C	Proper safety protocols were observed during the audit, such as use of hard hats on active timber sales. Written policies such as the timber sale handbook and Wisconsin forest management guidelines lay out some safety protocols.
4.2.b. The forest owner or manager and their employees and contractors demonstrate a safe work environment. Contracts or other written agreements include safety requirements.	NC	Review of timber sale contracts in Iron, Sawyer, and Washburn Counties did not show consistent inclusion of safety requirements. Although contracts contain training requirements, such as FISTA training, and the requirement to carry workman's compensation insurance, not all contracts specifically included safety requirements. For example, contracts in Sawyer and Washburn did not make specific reference to safety requirements or OSHA. Iron county have specific clauses requiring that contractors follow the OSHA Standard of Hazardous Communication regulations. However even in this case the contract specifically cites 29 CFR 1910.1200, which pertains to hazardous waste management, not the section of OSHA regulations covering logging operations (29 CFR 1910.266).
4.2.c. The forest owner or manager hires well-qualified service providers to safely implement the management plan.	C	Timber sale contracts include training requirements (FISTA, the SFI-approved logger training program). Master Logger status is encouraged (not required) on public land timber sales.
***C4.4. Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups (both men and women) directly affected by management operations.**	C	
4.4.a. The forest owner or manager understands the likely social impacts of management activities, and incorporates this understanding into	C	Summaries of social impacts are included in each of the 15-year plans, including descriptions of archeological sites, public resources, access

management planning and operations. Social impacts include effects on: • Archeological sites and sites of cultural, historical and community significance (on and off the FMU; • Public resources, including air, water and food (hunting, fishing, collecting); • Aesthetics; • Community goals for forest and natural resource use and protection such as employment, subsistence, recreation and health; • Community economic opportunities; • Other people who may be affected by management operations. A summary is available to the CB.		management, recreation, and other social concerns.
4.4.b. The forest owner or manager seeks and considers input in management planning from people who would likely be affected by management activities.	C	There is a high level of stakeholder consultation that goes into management planning. All planning activities are open to the public under government transparency laws such as the open meetings law. Each of the counties also participate in monthly forestry committee meetings.
4.4.c. People who are subject to direct adverse effects of management operations are apprised of relevant activities in advance of the action so that they may express concern.	C	On a project level basis, all harvests undergo a public notice process. Timber sales for the upcoming season are typically posted on the websites of the individual counties (see for example http://www.ironcountyforest.org/Forestry.html) Stakeholder outreach is also done through the public forest management planning process.
4.4.d. For ***public forests,*** consultation shall include the following components: 1. Clearly defined and accessible methods for public participation are provided in both long and short-term planning processes, including harvest plans and operational plans;	C	Participation in long-term management planning is done via the 15-year plan process. Counties held public meetings are part of that planning process. For shorter term projects, monthly forestry committee meetings are held.

2. Public notification is sufficient to allow interested stakeholders the chance to learn of upcoming opportunities for public review and/or comment on the proposed management; 3. An accessible and affordable appeals process to planning decisions is available. Planning decisions incorporate the results of public consultation. All draft and final planning documents, and their supporting data, are made readily available to the public.		Annual work plans, which are amendments to the 15 year plan, are approved through public County Board meetings as well. Public notification for short and longer term projects is ample to provide comment. Appeals to planning decisions are handled through monthly County Forestry Committee meetings. If unable to resolve at the Forestry Committee meeting- then the appellant can raise the issue to the County Board level. Management inconsistent with the 15 year plan or the County Forest statute may be reported to Dept. of Natural Resources staff for enforcement provided under the County Forest law.
C4.5. Appropriate mechanisms shall be employed for resolving grievances and for providing fair compensation in the case of loss or damage affecting the legal or customary rights, property, resources, or livelihoods of local peoples. Measures shall be taken to avoid such loss or damage.	C	
4.5.a. The forest owner or manager does not engage in negligent activities that cause damage to other people.	C	Audit team did not observe any evidence of negligent activities by any of the county forest operations during the audit.
4.5.b. The forest owner or manager provides a known and accessible means for interested stakeholders to voice grievances and have them resolved. If significant disputes arise related to resolving grievances and/or providing fair compensation, the forest owner or manager follows appropriate dispute resolution procedures. At a minimum, the forest owner or manager maintains open communications, responds to grievances in a timely manner, demonstrates ongoing good faith efforts to resolve the grievances, and maintains records of	C	At the most informal level, all county forests have open-door policies for stakeholder concerns. The public meeting process of the county governments that run the forestry programs provide a forum for resolution of stakeholder concerns. Underlying that are the procedures available to any parties that have grievances with county operations, with the courts utilized as a last resort.

legal suites and claims.		
4.5.c. Fair compensation or reasonable mitigation is provided to local people, communities or adjacent landowners for substantiated damage or loss of income caused by the landowner or manager.	NA	The audit team did not identify any areas where management of the county forest land has caused damage or loss of income to local people, communities, or adjacent landowners.
P5 Forest management operations shall encourage the efficient use of the forest's multiple products and services to ensure economic viability and a wide range of environmental and social benefits.		
***C5.5. Forest management operations shall recognize, maintain, and, where appropriate, enhance the value of forest services and resources such as watersheds and fisheries.**	C	
5.5.a. In developing and implementing activities on the FMU, the forest owner or manager identifies, defines and implements appropriate measures for maintaining and/or enhancing forest services and resources that serve public values, including municipal watersheds, fisheries, carbon storage and sequestration, recreation and tourism.	C	The 15-year plans in each county forest describe the maintenance and enhancement of resources that serve public values, such as watersheds, fisheries, uncut reserves, recreation and tourism. The county forest program has investigated carbon storage as an alternate revenue source, but has not found the markets to be viable at the moment.
5.5.b The forest owner or manager uses the information from Indicator 5.5.a to implement appropriate measures for maintaining and/or enhancing these services and resources.	C	Examples include the installation of recreation facilities, such as ATV washing stations in Iron county, that serve recreation needs while combating possible spread of invasive species.
***C5.6. The rate of harvest of forest products shall not exceed levels which can be permanently sustained.**		
5.6.a. In FMUs where products are being harvested, the landowner or manager calculates the sustained yield harvest level for each sustained yield planning unit, and provides clear rationale for determining the size and layout of the planning unit. The sustained yield harvest level calculation is documented in the Management Plan.	C	Harvest levels are regulated using area control with a stand based inventory. Levels are set based on specific property objectives and inventory (growth rates, age class, species distributions, etc). County forest inventory data is calculated in WisFIRS (Wisconsin Forest Inventory & Reporting System), which is used to manage the forest inventory data and to develop inventory reports, as well as to

The sustained yield harvest level calculation for each planning unit is based on: • documented growth rates for particular sites, and/or acreage of forest types, age-classes and species distributions; • mortality and decay and other factors that affect net growth; • areas reserved from harvest or subject to harvest restrictions to meet other management goals; • silvicultural practices that will be employed on the FMU; • management objectives and desired future conditions. The calculation is made by considering the effects of repeated prescribed harvests on the product/species and its ecosystem, as well as planned management treatments and projections of subsequent regrowth beyond single rotation and multiple re-entries.		describe and track timber harvests.
5.6.b. Average annual harvest levels, over rolling periods of no more than 10 years, do not exceed the calculated sustained yield harvest level.	C	Discussion with county foresters indicated that harvest levels were far below the level that could be permanently sustained. Typically, a set amount of area is targeted for harvest in a given year, based on a 15 year projection in WisFIRS, but the amount of harvest that actually occurs is far less due to practical difficulties in carrying out harvests and budget issues. For example. The target harvest area in Iron county is 4,000 acres per year, but they have averaged only 2,614 per year since 1996.
5.6.c. Rates and methods of timber harvest lead to achieving desired conditions, and improve or maintain health and quality across the FMU. Overstocked stands and stands that have been depleted or rendered to be below productive potential due to natural events, past management, or lack of management, are	C	County forests are accomplishing this goal through following the prescriptions laid out in the Silvicultural Handbook. There is an overall strategy to convert the block of single age class forests that were created due to large scale disturbances into uneven aged stands of multiple age classes.

returned to desired stocking levels and composition at the earliest practicable time as justified in management objectives.		
5.6.d. For NTFPs, calculation of quantitative sustained yield harvest levels is required only in cases where products are harvested in significant commercial operations or where traditional or customary use rights may be impacted by such harvests. In other situations, the forest owner or manager utilizes available information, and new information that can be reasonably gathered, to set harvesting levels that will not result in a depletion of the non-timber growing stocks or other adverse effects to the forest ecosystem.	NA	Significant commercial operations of NTFP's are not occurring.
P6 Forest management shall conserve biological diversity and its associated values, water resources, soils, and unique and fragile ecosystems and landscapes, and, by so doing, maintain the ecological functions and the integrity of the forest.		
***C6.1. Assessments of environmental impacts shall be completed -- appropriate to the scale, intensity of forest management and the uniqueness of the affected resources -- and adequately integrated into management systems. Assessments shall include landscape level considerations as well as the impacts of on-site processing facilities. Environmental impacts shall be assessed prior to commencement of site-disturbing operations.**	C	
6.1.a. Using the results of ***credible scientific analysis, best available information*** (including relevant databases), and local knowledge and experience, an assessment of conditions on the FMU is completed and includes: 1) Forest community types and development, size class and/or successional stages, and associated ***natural disturbance regimes***; 2) ***Rare, Threatened and Endangered (RTE) species*** and ***rare ecological communities*** (including plant communities);	C	Items 1-6 are covered through numerous sources including BMP's for Water Quality, 2460 Timber Sale forms, Natural Heritage Inventory review, Wildlife Action Plans and related Conservation Opportunity Areas, WisFIRS reports, Ecological Landscapes Handbook, and other tools.

3) Other habitats and species of management concern; 4) Water resources and associated riparian habitats and hydrologic functions; 5) ***Soil resources***; and 6) ***Historic conditions*** on the FMU related to forest community types and development, size class and/or successional stages, and a broad comparison of historic and current conditions.		
6.1.b. Prior to commencing site-disturbing activities, the forest owner or manager assesses and documents the potential short and long-term impacts of planned management activities on elements 1-5 listed in Criterion 6.1.a. The assessment must incorporate the ***best available information***, drawing from scientific literature and experts. The impact assessment will at minimum include identifying resources that may be impacted by management (e.g., streams, habitats of management concern, soil nutrients). Additional detail (i.e., detailed description or quantification of impacts) will vary depending on the uniqueness of the resource, potential risks, and steps that will be taken to avoid and minimize risks.	C	The 2460-001 form is the primary means by which individual timber sales are assessed for the short and long-term impacts of harvesting.
6.1.c. Using the findings of the impact assessment (Indicator 6.1.b), management approaches and field prescriptions are developed and implemented that: 1) avoid or minimize negative short-term and long-term impacts; and, 2) maintain and/or enhance the long-term ecological viability of the forest.	C	The impact assessment process results in numerous alterations to planned harvests in order to minimize impacts, such as watercourse buffer zones, seasonal restrictions on harvesting, and precautions for identified RTE species.
6.1.d. On public lands, assessments developed in Indicator 6.1.a and management approaches developed in Indicator 6.1.c are made available to the public in draft form for review and comment	C	At the county forest level, assessments are included as part of the 15-year plans. These are available online for each county. Individual 2460 forms are available online in some counties.

prior to finalization. Final assessments are also made available.		
C 6.2. Safeguards shall exist which protect rare, threatened and endangered species and their habitats (e.g., nesting and feeding areas). Conservation zones and protection areas shall be established, appropriate to the scale and intensity of forest management and the uniqueness of the affected resources. Inappropriate hunting, fishing, trapping, and collecting shall be controlled.	C	
6.2.a. If there is a likely presence of RTE species as identified in Indicator 6.1.a then either a field survey to verify the species' presence or absence is conducted prior to site-disturbing management activities, or management occurs with the assumption that potential RTE species are present. Surveys are conducted by biologists with the appropriate expertise in the species of interest and with appropriate qualifications to conduct the surveys. If a species is determined to be present, its location should be reported to the manager of the appropriate database.	C	NHI data is used as a part of every 2460 form to determine presence and location of rare features in a stand that has been identified for timber management, chemical pesticide treatment, prescribed fire, and/or other disturbing activities. In most cases species presence is assumed. Consultation with a DNR wildlife biologist determines whether new surveys are required or what the appropriate management should be to protect the feature. 2011 audit revealed several examples of modifications made to project plans to protect sensitive species and their habitats.
6.2.b. When RTE species are present or assumed to be present, modifications in management are made in order to maintain, restore or enhance the extent, quality and viability of the species and their habitats. ***Conservation zones*** and/or ***protected areas*** are established for RTE species, including those S3 species that are considered rare, where they are necessary to maintain or improve the short and long-term viability of the species. Conservation measures are based on relevant science, guidelines and/or consultation with relevant, independent experts as necessary to achieve the conservation goal of the Indicator.	C	SNAs protect or restore habitat for rare ecological species. The species and habitats are protected and enhanced if possible. Fire is often used to restore more open habitats like pine or oak barrens. Priority given to rare and sensitive species and habitats across all county forest lands. State Natural Areas primary role is protection and maintenance of special communities. More localized protection of RTE species in actively managed stands occurs through exclusion zone buffers, such as those for goshawks and eagles.
6.2.c. For medium and large public forests (e.g. state forests), forest management plans and operations	C	This is accomplished through the Wildlife Action Plan and the Conservation Opportunity Areas (COA's).

are designed to meet species' recovery goals, as well as landscape level biodiversity conservation goals.		During the 2011 audit foresters demonstrated good understanding of relevant COA's for their properties.
6.2.d. Within the capacity of the forest owner or manager, hunting, fishing, trapping, collecting and other activities are controlled to avoid the risk of impacts to vulnerable species and communities (See Criterion 1.5).	C	DNR wardens are primarily responsible for control of hunting, fishing, trapping, collecting and other impacts to RT&E species.
C6.3. Ecological functions and values shall be maintained intact, enhanced, or restored, including: a) Forest regeneration and succession. b) Genetic, species, and ecosystem diversity. c) Natural cycles that affect the productivity of the forest ecosystem.		
6.3.a.1. The forest owner or manager maintains, enhances, and/or restores under-represented ***successional*** stages in the FMU that would naturally occur on the types of sites found on the FMU. Where old growth of different community types that would naturally occur on the forest are under-represented in the landscape relative to natural conditions, a portion of the forest is managed to enhance and/or restore old growth characteristics.	C	County forests are aware of the under-represented successional stages on the landscape, and have demonstrated efforts to maintain, enhance, and or restore these communities. Planning and guidance documents covering this requirements include: -Silvicultural Handbook -Ecological Landscapes Handbook - Old Growth and Old Forest Handbook
6.3.a.2. When a ***rare ecological community*** is present, modifications are made in both the management plan and its implementation in order to maintain, restore or enhance the viability of the community. Based on the vulnerability of the existing community, ***conservation zones*** and/or ***protected areas*** are established where warranted.	C	Through the SNA establishment and other efforts managed by WDNR, rare ecological communities are identified for protection, management and/or restoration as needed.
6.3.a.3. When they are present, management maintains the area, structure, composition, and processes of all ***Type 1*** and ***Type 2 old growth***. Type 1 and 2 old growth are also protected and buffered as necessary with conservation zones, unless an alternative plan is developed that provides greater	C	Old growth definitions had not been updated to the new Type I and Type II definitions described in the FSC-US standard. However, this finding is only an observation, since a review of identified old-growth areas using the WisFRS system did not result in any

overall protection of old growth values. Type 1 Old Growth is protected from harvesting and road construction. Type 1 old growth is also protected from other timber management activities, except as needed to maintain the ecological values associated with the stand, including old growth attributes (e.g., remove exotic species, conduct controlled burning, and thinning from below in dry forest types when and where restoration is appropriate). Type 2 Old Growth is protected from harvesting to the extent necessary to maintain the area, structures, and functions of the stand. Timber harvest in Type 2 old growth must maintain old growth structures, functions, and components including individual trees that function as refugia (see Indicator 6.3.g). On public lands, old growth is protected from harvesting, as well as from other timber management activities, except if needed to maintain the values associated with the stand (e.g., remove exotic species, conduct controlled burning, and thinning from below in forest types when and where restoration is appropriate). On American Indian lands, timber harvest may be permitted in Type 1 and Type 2 old growth in recognition of their sovereignty and unique ownership. Timber harvest is permitted in situations where: 1. Old growth forests comprise a significant portion of the tribal ownership. 2. A history of forest stewardship by the tribe exists. 3. High Conservation Value Forest attributes are maintained. 4. Old-growth structures are maintained. 5. Conservation zones representative of old growth stands are established. 6. Landscape level considerations are addressed.		areas without management protections in place that would provide equivalent protection. See OBS 2011.2

7. Rare species are protected.		
6.3.b. To the extent feasible within the size of the ownership, particularly on larger ownerships (generally tens of thousands or more acres), management maintains, enhances, or restores habitat conditions suitable for well-distributed populations of animal species that are characteristic of forest ecosystems within the landscape.	C	County forests accomplish this through a network of special management areas.
6.3.c. Management maintains, enhances and/or restores the plant and wildlife habitat of ***Riparian Management Zones (RMZs)*** to provide: a) habitat for aquatic species that breed in surrounding uplands; b) habitat for predominantly terrestrial species that breed in adjacent ***aquatic habitats***; c) habitat for species that use riparian areas for feeding, cover, and travel; d) habitat for plant species associated with riparian areas; and, e) stream shading and inputs of wood and leaf litter into the adjacent aquatic ecosystem.	C	Trained foresters plan all projects; those with sensitive water-quality issues are reviewed by fisheries personnel and other specialists as needed. Water quality considerations including lakes or rivers potentially affected by the harvest are documented for each proposed harvest on a Form 2460-001 "Timber Sale Notice and Cutting Report" and this information is reflected in the harvesting requirements. Confirmed by reviews of completed and planned timber harvests that this program continues to operate effectively. Management related to RMZs has undergone significant updates with the publication of the latest Wisconsin's Forestry Best Management Practices for Water Quality, which lay out new protection measures for riparian and wetland habitats. Protection measures range from no harvest buffers to equipment exclusion zones, depending on the specifics of the resource under consideration.
Stand-scale Indicators 6.3.d Management practices maintain or enhance plant species composition, distribution and frequency of occurrence similar to those that would naturally occur on the site.	C	The silvicultural handbook describes guidelines for enhancing species composition and stand diversity, including moving towards more uneven-aged stand structures that better replicate natural stand conditions.
6.3.e. When planting is required, a local source of known provenance is used when available and when	C	The State nurseries provide local source of known

the local source is equivalent in terms of quality, price and productivity. The use of non-local sources shall be justified, such as in situations where other management objectives (e.g. disease resistance or adapting to climate change) are best served by non-local sources. ***Native species*** suited to the site are normally selected for regeneration.		provenance seeds and seedlings for planting.
6.3.f. Management maintains, enhances, or restores habitat components and associated stand structures, in abundance and distribution that could be expected from naturally occurring processes. These components include: a) large live trees, live trees with decay or declining health, ***snags***, and well-distributed coarse down and dead woody material. ***Legacy trees*** where present are not harvested; and b) vertical and horizontal complexity. Trees selected for ***retention*** are generally representative of the dominant species found on the site.	NC	Retention was observed in the harvest units visited during the audit, with a mix of live trees of different species representative of the stands. Management plans have not been updated to include the definition of legacy trees, and the requirement that they not be harvested. Although interviews with DNR staff indicated that they were aware of the definition, and that a draft policy addressing the issue was being prepared, it was not yet in effect. In addition, interviews with field staff resulted in varying interpretations as to what constituted a legacy tree, indicating that there is still uncertainty about this new requirement. See CAR 2011.3
6.3.g.1 In the Southeast, Appalachia, Ozark-Ouachita, Mississippi Alluvial Valley, and Pacific Coast Regions, when ***even-aged systems*** are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit as described in Appendix C for the applicable region. In the Lake States Northeast, Rocky Mountain and Southwest Regions, when even-aged silvicultural systems are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit in a proportion and configuration that is consistent with the characteristic natural disturbance regime unless retention at a lower level is necessary for the purposes of restoration or rehabilitation. See Appendix C for additional regional requirements and	C	The new state-wide silvicultural guidelines for retaining structural diversity in even-aged management systems have been implemented and foresters attended state-wide training to gain understanding and application of the new green tree retention standards.

guidance.		
6.3.g.2 Under very limited situations, the landowner or manager has the option to develop a qualified plan to allow minor departure from the opening size limits described in Indicator 6.3.g.1. A qualified plan: 1. Is developed by qualified experts in ecological and/or related fields (wildlife biology, hydrology, landscape ecology, forestry/silviculture). 2. Is based on the totality of the ***best available information*** including peer-reviewed science regarding natural disturbance regimes for the FMU. 3. Is spatially and temporally explicit and includes maps of proposed openings or areas. 4. Demonstrates that the variations will result in equal or greater benefit to wildlife, water quality, and other values compared to the normal opening size limits, including for sensitive and rare species. 5. Is reviewed by independent experts in wildlife biology, hydrology, and landscape ecology, to confirm the preceding findings.	NA	There were no departures from opening size limits.
6.3.h. The forest owner or manager assesses the risk of, prioritizes, and, as warranted, develops and implements a strategy to prevent or control ***invasive species***, including: 1. a method to determine the extent of invasive species and the degree of threat to native species and ecosystems; 2. implementation of management practices that minimize the risk of invasive establishment, growth, and spread; 3. eradication or control of established invasive populations when feasible: and,	C	Invasive species are tracked during inventory surveys and pre-harvest timber surveys. 15-year plans describe control measures that are in place for invasive species located on the forest. No concerning amount of invasives were encountered during the audit.

4. monitoring of control measures and management practices to assess their effectiveness in preventing or controlling invasive species.		
6.3.i. In applicable situations, the forest owner or manager identifies and applies site-specific fuels management practices, based on: (1) natural fire regimes, (2) risk of wildfire, (3) potential economic losses, (4) public safety, and (5) applicable laws and regulations.	C	Observed excellent utilization at site visits, and did not see any non-conformances with fuel loading.
C6.4. Representative samples of existing ecosystems within the landscape shall be protected in their natural state and recorded on maps, appropriate to the scale and intensity of operations and the uniqueness of the affected resources.	C	
6.4.a. The forest owner or manager documents the ecosystems that would naturally exist on the FMU, and assesses the adequacy of their representation and protection in the ***landscape*** (see Criterion 7.1). The assessment for medium and large forests include some or all of the following: a) ***GAP analyses***; b) collaboration with state natural heritage programs and other public agencies; c) regional, landscape, and watershed planning efforts; d) collaboration with universities and/or local conservation groups. For an area that is not located on the FMU to qualify as a Representative Sample Area (RSA), it should be under permanent protection in its natural state.	C	The SNA system has not undergone any significant updates since the most recent recertification audit. BER has developed a gap document to identify needs and opportunities for representative samples on County Forests, furthermore, a process has been completed for each County (or ecoregional groupings of County Forests) to meet with BER to complete the assessment of opportunities. The State of Wisconsin has one of the best SNA programs in the US. BER actively conducts analyses of the adequacy of the current network of reserve areas in Wisconsin and County Forests have largely been cooperative where opportunities arise. All County Forests describe contributions to State Natural Areas in chapter 530 of the 15-year Land Use Plans. Other representative areas have been established in a more informal manner by removing them from the harvest schedule through special encoding in Recon/WisFIRS.

		Because the County Forest system originated from a highly degraded landscape, opportunities for representative samples are limited.
6.4.b. Where existing areas within the landscape, but external to the FMU, are not of adequate protection, size, and configuration to serve as representative samples of existing ecosystems, forest owners or managers, whose properties are conducive to the establishment of such areas, designate ecologically viable RSAs to serve these purposes. Large FMUs are generally expected to establish RSAs of purpose 2 and 3 within the FMU.	C	The SNA program was developed at a state-wide level, analyzing opportunities for representative areas across different categories of ownership.
6.4.c. Management activities within RSAs are limited to low impact activities compatible with the protected RSA objectives, except under the following circumstances: a) harvesting activities only where they are necessary to restore or create conditions to meet the objectives of the protected RSA, or to mitigate conditions that interfere with achieving the RSA objectives; or b) road-building only where it is documented that it will contribute to minimizing the overall environmental impacts within the FMU and will not jeopardize the purpose for which the RSA was designated.	C	Management activities within SNAs are either no-harvest, or harvesting is only done in a way to maintain the identified objectives. For example, the Penokee range includes a no-harvest area at the core surrounded by areas focused on uneven aged hardwood management
6.4.d. The RSA assessment (Indicator 6.4.a) shall be periodically reviewed and if necessary updated (at a minimum every 10 years) in order to determine if the need for RSAs has changed; the designation of RSAs	C	Original designation of SNAs occurred less than 10 years ago.

(Indicator 6.4.b) is revised accordingly.		
6.4.e. Managers of large, contiguous public forests establish and maintain a network of representative protected areas sufficient in size to maintain species dependent on interior core habitats.	C	No contiguous blocks of this size occur on the county forests.
C6.5. Written guidelines shall be prepared and implemented to control erosion; minimize forest damage during harvesting, road construction, and all other mechanical disturbances; and to protect water resources.	C	
6.5.a. The forest owner or manager has written guidelines outlining conformance with the Indicators of this Criterion.	C	Written guidelines are contained in numerous places, including the new BMPs, rutting policy guidelines, and 15-year plans.
6.5.b. Forest operations meet or exceed Best Management Practices (BMPs) that address components of the Criterion where the operation takes place.	C	In general during the audit, field inspections indicated that the new BMPS were being followed. Violations of the BMPs that occurred during prior audits were visited in order to ensure that corrective measures had been taken (see CAR 2010.1)
6.5.c. Management activities including site preparation, harvest prescriptions, techniques, timing, and equipment are selected and used to protect soil and water resources and to avoid erosion, landslides, and significant soil disturbance. Logging and other activities that significantly increase the risk of landslides are excluded in areas where risk of landslides is high. The following actions are addressed: • Slash is concentrated only as much as necessary to achieve the goals of site preparation and the reduction of fuels to moderate or low levels of fire hazard.	C	The BMPs and rutting guidelines are the primary mechanisms to address these issues. Soil rutting has been an ongoing issue, but new guidelines have resulted in a reduction of rutting. The implication of these guidelines during operations was discussed during the audit, and have resulted in shutting down operators more frequently than had been done in the past. In addition the unusually dry summers in recent years have allowed for a greater window of operation than is usually available. Enforcement of the rutting guidelines will become more crucial as the summers get wetter.

• Disturbance of topsoil is limited to the minimum necessary to achieve successful regeneration of species native to the site. • Rutting and compaction is minimized. • Soil erosion is not accelerated. • Burning is only done when consistent with natural disturbance regimes. • Natural ground cover disturbance is minimized to the extent necessary to achieve regeneration objectives. • Whole tree harvesting on any site over multiple rotations is only done when research indicates soil productivity will not be harmed. • Low impact equipment and technologies is used where appropriate.		
6.5.d. The transportation system, including design and placement of permanent and temporary haul roads, skid trails, recreational trails, water crossings and landings, is designed, constructed, maintained, and/or reconstructed to reduce short and long-term environmental impacts, habitat fragmentation, soil and water disturbance and cumulative adverse effects, while allowing for customary uses and use rights. This includes: • access to all roads and trails (temporary and permanent), including recreational trails, and off-road travel, is controlled, as possible, to minimize ecological impacts; • road density is minimized; • erosion is minimized; • sediment discharge to streams is minimized; • there is free upstream and downstream passage for aquatic organisms; • impacts of transportation systems on wildlife habitat and migration corridors are minimized; • area converted to roads, landings and skid trails is minimized; • habitat fragmentation is minimized; • unneeded roads are closed and rehabilitated.	C	BMPs describe road layout factors in the section on location and design BMPs. Guidelines include factors such as minimizing crossings, using existing roads rather than making new ones, and minimizing road grades.

6.5.e.1.In consultation with appropriate expertise, the forest owner or manager implements written ***Streamside Management Zone*** (SMZ) ***buffer*** management guidelines that are adequate for preventing environmental impact, and include protecting and restoring water quality, hydrologic conditions in rivers and stream corridors, wetlands, vernal pools, seeps and springs, lake and pond shorelines, and other hydrologically sensitive areas. The guidelines include vegetative buffer widths and protection measures that are acceptable within those buffers. In the Appalachia, Ozark-Ouachita, Southeast, Mississippi Alluvial Valley, Southwest, Rocky Mountain, and Pacific Coast regions, there are requirements for minimum SMZ widths and explicit limitations on the activities that can occur within those SMZs. These are outlined as requirements in Appendix E.	C	Buffer zones were laid out in the BMPs, which were reviewed at a state-wide level and included input from local universities, environmental groups, and industry scientists.
6.5.e.2. Minor variations from the stated minimum SMZ widths and layout for specific stream segments, wetlands and other water bodies are permitted in limited circumstances, provided the forest owner or manager demonstrates that the alternative configuration maintains the overall extent of the buffers and provides equivalent or greater environmental protection than FSC-US regional requirements for those stream segments, water quality, and aquatic species, based on site-specific conditions and the best available information. The forest owner or manager develops a written set of supporting information including a description of the riparian habitats and species addressed in the alternative configuration. The CB must verify that the	NA	

variations meet these requirements, based on the input of an independent expert in aquatic ecology or closely related field.		
6.5.f. Stream and wetland crossings are avoided when possible. Unavoidable crossings are located and constructed to minimize impacts on water quality, hydrology, and fragmentation of ***aquatic habitat.*** Crossings do not impede the movement of aquatic species. Temporary crossings are restored to original hydrological conditions when operations are finished.	C	BMPs lay out guidelines that stress avoidance of crossings, and using crossings that maintain unimpeded waterflow. Observations during the audit did not identify any problematic crossings, other than ones previously identified in CAR 2010.1
6.5.g. Recreation use on the FMU is managed to avoid negative impacts to soils, water, plants, wildlife and wildlife habitats.	C	Recreation use on the county forests are managed in order to limit negative impacts. The largest potential impact is from off-road recreational vehicle use. Each county maintains a road maintenance system, identifying areas on the trail system where ORV use has led to erosion or other soil impact issues. Sites are prioritized for risk and repaired depending on funding. The audit team reviewed this system in action on numerous trails in Washburn County. While some individual instances of erosion were identified, the overall system was in conformance to the indicator.
6.5.h. Grazing by domesticated animals is controlled to protect in-stream habitats and water quality, the species composition and viability of the riparian vegetation, and the banks of the stream channel from erosion.	NA	There is no domesticated grazing on county forests.
C6.6. Management systems shall promote the development and adoption of environmentally friendly non-chemical methods of pest management and strive to avoid the use of chemical pesticides. World Health Organization Type 1A and 1B and chlorinated hydrocarbon pesticides; pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement, shall be	C	

prohibited. If chemicals are used, proper equipment and training shall be provided to minimize health and environmental risks.		
6.6.b. All toxicants used to control pests and competing vegetation, including rodenticides, insecticides, herbicides, and fungicides are used only when and where non-chemical management practices are: a) not available; b) prohibitively expensive, taking into account overall environmental and social costs, risks and benefits; c) the only effective means for controlling invasive and exotic species; or d) result in less environmental damage than non-chemical alternatives (e.g., top soil disturbance, loss of soil litter and down wood debris). If chemicals are used, the forest owner or manager uses the least environmentally damaging formulation and application method practical. Written strategies are developed and implemented that justify the use of chemical pesticides. Whenever feasible, an eventual phase-out of chemical use is included in the strategy. The written strategy shall include an analysis of options for, and the effects of, various chemical and non-chemical pest control strategies, with the goal of reducing or eliminating chemical use.	C	Pesticide use is quite limited on the county forests visited during the audit, with only one county reporting any regular use. The county forests avoid this problem through silvicultural systems aimed at promoting regeneration without the need for chemical control of competing vegetation. Chemical applications are only used when other methods have been proven ineffective.
6.6.d. Whenever chemicals are used, a written prescription is prepared that describes the site-specific hazards and environmental risks, and the precautions that workers will employ to avoid or minimize those hazards and risks, and includes a map of the treatment area. Chemicals are applied only by workers who have received proper training in application methods and safety. They are made aware of the risks, wear proper safety equipment, and are trained to minimize environmental impacts on non-target	C	The audit team reviewed several pesticide application plans in Washburn county, and associated ground spraying contracts. Each contained a site specific prescription noting hazards and risks on the map of the site. Chemical applicators are required to be licensed by the state. A limited number of experienced contractors are used to ensure high quality of application.

species and sites.		
C6.8. Use of biological control agents shall be documented, minimized, monitored, and strictly controlled in accordance with national laws and internationally accepted scientific protocols. Use of genetically modified organisms shall be prohibited.	C	
6.8.b. If biological control agents are used, they are applied by trained workers using proper equipment.	C	Biological control agents are only applied through state-wide efforts. When this occurs, involved parties under proper training.
6.8.c. If biological control agents are used, their use shall be documented, monitored and strictly controlled in accordance with state and national laws and internationally accepted scientific protocols. A written plan will be developed and implemented justifying such use, describing the risks, specifying the precautions workers will employ to avoid or minimize such risks, and describing how potential impacts will be monitored.	C	Biological controls have been used only in limited cases, for example on invasive species such as spotted knapweed and purple loosestrife. In such cases, the program is managed through state-wide control efforts, not at the individual forest level. When new biocontrols are introduced, they are only done so after scientific review.
C6.9. The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.	C	
6.9.a. The use of ***exotic species*** is contingent on the availability of credible scientific data indicating that any such species is non-invasive and its application does not pose a risk to native biodiversity.	C	Exotic species are not used for commercial purposes on state lands. When clover mixes are used for stabilizing soil on trails, the seed mix is identified as being either native grasses or plants with low level of aggressive invasive potential.
6.9.b. If exotic species are used, their provenance and the location of their use are documented, and their ecological effects are actively monitored.	C	Not used
6.9.cThe forest owner or manager shall take timely action to curtail or significantly reduce any adverse impacts resulting from their use of exotic species	C	Not used.
C6.10. Forest conversion to plantations or non-	C	Conversions to non-forested areas is very limited in

forest land uses shall not occur, except in circumstances where conversion: **a) Entails a very limited portion of the forest management unit; and b) Does not occur on High Conservation Value Forest areas; and c) Will enable clear, substantial, additional, secure, long-term conservation benefits across the forest management unit.**		size, and primarily restricted to prairie restoration and large grassland management areas for specific desired habitat conditions (ie. sharptail grouse).
P7 A management plan -- appropriate to the scale and intensity of the operations -- shall be written, implemented, and kept up to date. The long-term objectives of management, and the means of achieving them, shall be clearly stated.		
***C7.1. The management plan and supporting documents shall provide:** **a) Management objectives. b) description of the forest resources to be managed, environmental limitations, land use and ownership status, socio-economic conditions, and a profile of adjacent lands.** **c) Description of silvicultural and/or other management system, based on the ecology of the forest in question and information gathered through resource inventories. d) Rationale for rate of annual harvest and species selection. e) Provisions for monitoring of forest growth and dynamics. f) Environmental safeguards based on environmental assessments. g) Plans for the identification and protection of rare, threatened and endangered species.** **h) Maps describing the forest resource base including protected areas, planned management activities and land ownership.** **i) Description and justification of harvesting techniques and equipment to be used.**	C	
7.1.d. The management plan includes a description of the landscape within which the FMU is located and	C	The county 15-year plans describe how the forests fit into the overall landscape, including describing the

describes how landscape-scale habitat elements described in Criterion 6.3 will be addressed.		ecological landscapes of Wisconsin. This is supported by DNR documents such as Ecological Landscapes of Wisconsin, (WDNR Handbook 1805.1). The landscape scale indicators described in 6.3 are described in planning documents such as the 2460 "Timber Sale Notice and Cutting Report" forms, and the Silvicultural Handbook.
7.1.f. If invasive species are present, the management plan describes invasive species conditions, applicable management objectives, and how they will be controlled (see Indicator 6.3.j).	C	WDNR has implemented a set of state-wide BMPs for invasive species management that address elements of 6.3.j. Individual county plans have sections on the specific invasive species applicable to each forest, although the level of detail is not consistent between the forests, i.e. in some cases stand-alone invasive species plans have been developed, and in others they exist only as boilerplate sections within the 15-year plans.
7.1.j. The management plan incorporates the results of the evaluation of social impacts, including: • traditional cultural resources and rights of use (see Criterion 2.1); • potential conflicts with customary uses and use rights (see Criteria 2.2, 2.3, 3.2); • management of ceremonial, archeological, and historic sites (see Criteria 3.3 and 4.5); • management of aesthetic values (see Indicator 4.4.a); • public access to and use of the forest, and other recreation issues; • local and regional socioeconomic conditions and economic opportunities, including creation and/or maintenance of quality jobs (see Indicators 4.1.b and 4.4.a), local purchasing opportunities (see Indicator 4.1.e), and participation in local development opportunities (see Indicator 4.1.g).	C	15-year plans contain elements of social impact assessment throughout, such as sections on aesthetic management areas, public access and recreation, treaty gathering rights, etc. See C4.4

7.1.k. The management plan describes the general purpose, condition and maintenance needs of the transportation network (see Indicator 6.5.e).	C	The 15-year plans contain Road and Access Plans in section 700, describing the condition of the road network on each unit, and identifying management needs.
7.1.n. The management plan includes a description of monitoring procedures necessary to address the requirements of Criterion 8.2.	C	Monitoring of the Master Plan objectives and implementation is well addressed. Monitoring results for the counties are collected at: http://dnr.wi.gov/topic/CountyForests/monitoring.html
7.1.r. The management plan describes the stakeholder consultation process.		Stakeholder consultation for the 15 year plans is required by the Wisconsin Environmental Protection Act (WEPA), specifically mentioning the Plans and can be found at http://docs.legis.wi.gov/code/admin_code/nr/150.pdf In addition, in the Environmental Assessment for the County Forest Plans (which you should have) item # 1 under the Project Summary lists a "Brief Overview" of the process.
P8 Monitoring shall be conducted -- appropriate to the scale and intensity of forest management -- to assess the condition of the forest, yields of forest products, chain of custody, management activities and their social and environmental impacts. *Applicability Note: On small and medium-sized forests (see Glossary), an informal, qualitative assessment may be appropriate. Formal, quantitative monitoring is required on large forests and/or intensively managed forests.*		
C8.1. The frequency and intensity of monitoring should be determined by the scale and intensity of forest management operations, as well as, the relative complexity and fragility of the affected environment. Monitoring procedures should be consistent and replicable over time to allow comparison of results and assessment of change.	c	
8.1.a. Consistent with the scale and intensity of management, the forest owner or manager develops and consistently implements a regular, comprehensive, and replicable written monitoring protocol.	C	A regular and comprehensive monitoring protocol has been implemented. The core of the monitoring program is RECON inventory updates. County and DNR Staff has made great progress in the last three years at updating this inventory. The results go into a state-wide database (WisFIRs) used to develop

		harvest schedules. In addition, regular wildlife surveys are conducted by WDNR, that cross between state and county forestland.
8.2. Forest management should include the research and data collection needed to monitor, at a minimum, the following indicators: a) yield of all forest products harvested, b) growth rates, regeneration, and condition of the forest, c) composition and observed changes in the flora and fauna, d) environmental and social impacts of harvesting and other operations, and e) cost, productivity, and efficiency of forest management.	C	
8.2.a.1. For all commercially harvested products, an inventory system is maintained. The inventory system includes at a minimum: a) species, b) volumes, c) stocking, d) regeneration, and e) stand and forest composition and structure; and f) timber quality.	C	Topics a-f are monitored through Wisconsin Forest Inventory & Reporting System (WisFIRS).
8.2.a.2. Significant, unanticipated removal or loss or increased vulnerability of forest resources is monitored and recorded. Recorded information shall include date and location of occurrence, description of disturbance, extent and severity of loss, and may be both quantitative and qualitative.	C	Monitored through Wisconsin Forest Inventory & Reporting System (WisFIRS).
8.2.b The forest owner or manager maintains records of harvested timber and NTFPs (volume and product and/or grade). Records must adequately ensure that the requirements under Criterion 5.6 are met.	C	Monitored through Wisconsin Forest Inventory & Reporting System (WisFIRS).
8.2.c. The forest owner or manager periodically obtains data needed to monitor presence on the	C	Monitored through Natural Heritage Inventory, WisFIRS, and specific monitoring protocol for SNA's.

FMU of: 1) Rare, threatened and endangered species and/or their ***habitats***; 2) Common and rare plant communities and/or habitat; 3) Location, presence and abundance of invasive species; 4) Condition of protected areas, set-asides and buffer zones; 5) High Conservation Value Forests (see Criterion 9.4).		See http://dnr.wi.gov/org/land/er/forms/1700-021.pdf for details of monitoring of SNA's.
8.2.d.1. Monitoring is conducted to ensure that site specific plans and operations are properly implemented, environmental impacts of site disturbing operations are minimized, and that harvest prescriptions and guidelines are effective.	C	Site specific monitoring occurs while harvest operations are ongoing, and visits are documented. For example, reviews of Sawyer county timber sales records included documentation of a start-up meeting with a logger, then at least weekly check-ins until the job was completed or shut down due to weather conditions. (reviewed sales #2672-10; 2653-10; 2539-08)
8.2.d.2. A monitoring program is in place to assess the condition and environmental impacts of the forest-road system.	C	Monitoring of conditions and impacts of roads occurs informally through direct observation by foresters during the course of normal observations. As noted in C6.5, this system is working adequately, but could be improved.
8.2.d.3. The landowner or manager monitors relevant socio-economic issues (see Indicator 4.4.a), including the social impacts of harvesting, participation in local economic opportunities (see Indicator 4.1.g), the creation and/or maintenance of quality job opportunities (see Indicator 4.1.b), and local purchasing opportunities (see Indicator 4.1.e).	C	See Criterion 4.4. Monitoring is done through regular engagement with in forest practices groups, such as the Great Lakes Timber Professionals Association and tracking of job creation in the forest industry at a state-wide level.
8.2.d.4. Stakeholder responses to management activities are monitored and recorded as necessary.	C	Stakeholder responses are recorded in the form of public meeting minutes and records of individual meetings.
8.2.d.5. Where sites of cultural significance exist,	C	Such opportunities are offered to tribal

the opportunity to jointly monitor sites of cultural significance is offered to tribal representatives (see Principle 3).		representatives through working with the DNR Archeologist.
8.2.e. The forest owner or manager monitors the costs and revenues of management in order to assess productivity and efficiency.	C	All budgets with the DNR and individual counties are carefully controlled and thus results in monitoring of costs and revenues. An analysis of staffing needs is done each year as part of the work plan process for each county.

P9 Management activities in high conservation value forests shall maintain or enhance the attributes which define such forests. Decisions regarding high conservation value forests shall always be considered in the context of a precautionary approach.

High Conservation Value Forests are those that possess one or more of the following attributes:

a) Forest areas containing globally, regionally or nationally significant: concentrations of biodiversity values (e.g., endemism, endangered species, refugia); and/or large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance

b) Forest areas that are in or contain rare, threatened or endangered ecosystems

c) Forest areas that provide basic services of nature in critical situations (e.g., watershed protection, erosion control)

d) Forest areas fundamental to meeting basic needs of local communities (e.g., subsistence, health) and/or critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).

Examples of forest areas that *may have* high conservation value attributes include, but are not limited to:

Central Hardwoods:

- Old growth – (see Glossary) (a)
- Old forests/mixed age stands that include trees >160 years old (a)
- Municipal watersheds –headwaters, reservoirs (c)
- Rare, Threatened, and Endangered (RTE) ecosystems, as defined by GAP analysis, Natural Heritage Inventory, and/or the World Wildlife Fund's Forest Communities of Highest Conservation Concern, and/or Great Lakes Assessment (b)
- Intact forest blocks in an agriculturally dominated landscape (refugia) (a)
- Intact forests >1000 ac (valuable to interior forest species) (a)
- Protected caves (a, b, or d)
- Savannas (a, b, c, or d)
- Glades (a, b, or d)
- Barrens (a, b, or d)
- Prairie remnants (a, b, or d)

North Woods/Lake States:

- Old growth – (see Glossary) (a)
- Old forests/mixed age stands that include trees >120 years old (a)
- Blocks of contiguous forest, > 500 ac, which host RTEs (b)
- Oak savannas (b)
- Hemlock-dominated forests (b)
- Pine stands of natural origin (b)
- Contiguous blocks, >500 ac, of late successional species, that are managed to create old growth (a)
- Fens, particularly calcareous fens (c)
- Other non-forest communities, e.g., barrens, prairies, distinctive geological land forms, vernal pools (b or c)
- Other sites as defined by GAP analysis, Natural Heritage Inventory, and/or the World Wildlife Fund's Forest Communities of Highest Conservation Concern (b)

Note: In the Lake States-Central Hardwoods region, old growth (see Glossary) is both rare and invariably an HCVF.

In the Lake States-Central Hardwoods region, cutting timber is not permitted in old-growth stands or forests.

Note: Old forests (see Glossary) may or may not be designated HCVFs. They are managed to maintain or recruit: (1) the existing abundance of old trees and (2) the landscape- and stand-level structures of old-growth forests, consistent with the composition and structures produced by natural processes.

Old forests that either have or are developing old-growth attributes, but which have been previously harvested, may be designated HCVFs and may be harvested under special plans that account for the ecological attributes that make it an HCVF.

Forest management maintains a mix of sub-climax and climax old-forest conditions in the landscape.

C9.4. Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.	C	
9.4.a. The forest owner or manager monitors, or participates in a program to annually monitor, the status of the specific HCV attributes, including the effectiveness of the measures employed for their maintenance or enhancement. The monitoring program is designed and implemented consistent with the requirements of Principle 8.	C	An HCVF monitoring program has been funded and partially completed. Counties that have receeived monitoring include Iron, Sawyer, Bayfield, and Ashland. The majority of HCVF areas are unmanaged. However the ones that do require active management receive monitoring as part of normal harvesting operations.
9.4.b. When monitoring results indicate increasing risk to a specific HCV attribute, the	C	Management plans are altered to protect HCV attributes when monitoring shows that they are at

forest owner/manager re-evaluates the measures taken to maintain or enhance that attribute, and adjusts the management measures in an effort to reverse the trend.		risk.

Appendix 8 – Chain of Custody Indicators for FMEs (CONFIDENTIAL)

SCS FSC Chain of Custody Indicators For Forest management enterprises

Any Forest Management Enterprise (FME) that wishes to sell FSC-certified product must develop a comprehensive set of procedures that describes how it will maintain control of FSC-certified material from "the stump to the forest gate," or, in other words, from the forest of origin to the point at which the certified product changes ownership.

The purpose of this document is to provide COC indicators for FMEs located in regions in which the national or regional standards provide little or no guidance on FSC COC norms. This document is based on FSC Chain of Custody Standard (FSC-STD-40-004 V2-0), Forest Certification Reports (FSC-STD-20-007a V1-0, Box 1, section 6: Tracking, tracing and identification of certified products), Requirements for use of the FSC trademarks by Certificate Holders (FSC-STD-50-001 V1-2), and FSC Directive on Chain of Custody Certification (FSC-DIR-40-004 EN, updated 30 – March – 2011).

COC procedures that address all of these indicators are required for large-scale operations (>10,000 ha/ >24,710 acres) and Group/ Multiple FMU Certificates. SCS Auditors shall complete the fields labeled, "SCS Auditor Findings," as well as any necessary check boxes for large-scale operations and Group/ Multiple FMU Certificates. For small-scale operations (<10,000 ha/ <24,710 acres; single-SLIMFs) the SCS auditor shall evaluate the indicators included in Appendix 1 of this document.

1. Quality Management

What you need to know: FSC COC systems require that FMEs have a representative with responsibility for its compliance with FSC requirements (a specific person or title). Training must be provided to staff for each procedure with records of training and a written training plan. ***Complete records of all FSC-related activities, including sales and training, must be kept for at least five years.***

The indicators provided in the following sections shall be used to evaluate the FME's COC Control System (CS) and the implementation of its COC control system.

1.1. Chain of Custody Scope and compliance information:

1.1.1. The FME shall provide the names or titles of its: **A) COC administrator(s);** **B) Person/position(s) responsible for maintaining records on harvest volumes, invoices, and shipping documentation; and** **C) Person/position(s) responsible for labeling and promotional claims.**		
SCS Auditor Findings: COC is implemented by Jeff Barkley at the group manager level, and by the individual county forest administrators at the county level. The counties are responsible for maintaining records of harvest volumes, invoices and other documentation. Promotional claims are the responsibility of the counties, but DNR provides extensive support and training.		
1.1.2. The FME shall maintain complete records of all FSC-related COC activities, including sales and training, for at least 5 years.		
SCS Auditor Findings: Records are kept for at least five years.		
1.1.3. The FME shall define its forest gate(s).		
SCS Auditor Findings: Since the counties sell stumpage, the forest gate is at the stump, and responsibility for maintaining COC transfers when the trees are severed.		
1.1.4 The FME shall have sufficient control over its forest gate(s) as to ensure that there is no mixing of FSC-certified forest products covered by the scope of its FM/COC certificate with forest products from outside of the scope prior to the transfer of ownership, including the following:		
1.1.4.1. The FME and its contractors shall not process FSC-certified material prior to transfer of ownership at the forest gate without conforming to applicable chain of custody requirements. *NOTE: This does not apply to log cutting or de-barking units, small portable sawmills or on-site processing of chips/biomass originating from the FMU under evaluation. If any such on-site processing is done by contractors, this must be covered in FME's outsourcing procedures.*		
1. Does any processing of FSC-certified material occur prior to transfer of ownership at the forest gate?	**☐ Yes**	**☒ No**
1.1.4.2. The FME shall not acquire FSC-certified material from other FSC certificate holders without a valid FSC Chain of Custody certificate and adherence to its COC procedures.		
2. Does FME acquire FSC-certified material from other FSC certificate holders and plan to sell that material as FSC certified?	**☐ Yes**	**☒ No**
1.1.4.3. There shall be no mixing of non-FSC- and FSC-certified materials prior to transfer of ownership at the forest gate.		
3. Does mixing of non-FSC- and FSC-certified materials occur prior to transfer of	**☐ Yes**	**☒ No**

ownership at the forest gate (i.e., FME has excised forested areas from the scope of the certificate and uses same logging decks for both FMUs)?		
4. Is there a risk of mixing FSC-certified with non-certified material? If so, what steps are taken to remove this risk? *Describe steps taken to remove risk of mixing:* NA	☐ **Yes**	☒ **No**
SCS Auditor Findings: The Wisconsin County Forest System is at low risk for mixing sales of certified and uncertified wood. However, because not all counties are enrolled in the FSC group, there is a risk that purchasers of timber may assume that all county forest land provides FSC 100% material. Such a situation did occur in the past year. However, this is a non-conformance on the part of the purchaser, not the county.		

FME must be evaluated to FSC-STD-40-004:	☐ **Yes**	☐ **No**	☒ N/A
FME must apply for separate COC certificate:	☐ **Yes**	☐ **No***	
FME was evaluated previously to FSC-STD-40-004:	☐ **Yes**	☐ **No**	
FME already has a separate COC certificate:	☐ **Yes**	☐ **No**	

****FSC-STD-20-011 Annex 1 is required as an attachment to FM report if FME must be evaluated to FSC-STD-40-004 if no separate COC certificate is required. Ask SCS staff for further details.***

1.2. TRAINING

1.2.1. The FME shall maintain up-to-date records of its training program, including a list of trained employees, completed COC trainings, the intended frequency of COC training (i.e. training plan), and related training program materials (e.g., documents, presentations).
SCS Auditor Findings: County forests administrators undergo annual training, including on COC procedures. Training presentations were reviewed by the audit team.
1.2.2. All relevant personnel, including contractors, shall be trained in the FME's COC control system and demonstrate competence in implementing the FME's COC control system.
SCS Auditor Findings: There was one instance of a violation of the requirement that invoices and shipping documentation include the FSC claim, despite training conducted on the matter. See OBS 2011.4

1.3. FSC-CERTIFIED PRODUCT CONTROL, SALES AND DELIVERY

1.3.1. The FME shall implement documented procedures for the following: **A) Marking and/or segregating FSC-certified material from non-certified material;** **B) Tracking quantities of FSC-certified product and;** **C) Invoicing and other related documentation for FSC-certified product sales and delivery.**

A) Is FSC-certified material identifiable and separable from non-certified material at all stages prior to transfer of ownership at the forest gate(s)?	☒ **Yes**	☐ **No** *Include CARs/OBSs below.*
B) Are records of quantities/volumes of FSC-certified product complete, correct and up-to-date?	☒ **Yes**	☐ **No** *Include CARs/OBSs below.*
C) Is FSC-certified material for sale correctly classified on invoices and shipping documentation? *For FM/COC certificates, the only acceptable claim on invoices and shipping documentation is "FSC 100%."* *For CW/FM certificates, the only acceptable claim on invoices and shipping documentation is "FSC Controlled Wood."* *Invoices/ shipping documentation must include the FME's certificate code when making an FSC sale. See* ***Appendix 2*** *for more detailed information on required information on invoices and exceptions.*	☐ **Yes**	☒ **No** *Include CARs/OBSs below.*
SCS Auditor Findings: As described in OBS 2011.4, there was one instance of county shipping documentation not including the FSC claim. It was not stamped on the trip ticket, and the purchaser did not have a copy of the letter produced by the county forests to supplement the tickets. Since corrective actions were already in place to address this issue, the finding is only an observation.		

1.4. LABELING AND PROMOTION

Does the FME use or plan to use FSC or SCS trademarks? *All FSC logo and trademark rules are included in* FSC-STD-50-001 V1-2. *See www.fsc.org or contact SCS for access to the standard. Contact SCS for rules regarding the use of SCS trademarks.* *CW/FM certificates supplying FSC Controlled Wood shall not make claims regarding FSC Controlled Wood or use the statement 'FSC Controlled Wood' or the FSC Trademarks on-product or on point of sale materials or in any other promotional material. Any violation of this policy may be subject to corrective actions and/or immediate suspension. See Annex 3 of* FSC Controlled Wood standard for forest management enterprises (FSC-STD-30-010 V2-0) *for more information.*	☒ **Yes** *Complete this section*	☐ **No** *Move on to next question.*
Did the evaluation reveal any unauthorized or improper use of FSC or SCS trademarks by the FME not addressed in A)-C) below?	☐ **Yes** *Include CAR(s) in findings.*	☒ **No** *Skip this section.*
1.4.1. The FME shall describe its on-product and promotional uses or intended uses of the FSC and/or SCS trademarks.		
SCS Auditor Findings: DNR staff reviewed uses of the logo for promotional purposes with SCS staff prior		

to use for approval. DNR is not engaged in on-product labeling.			
1.4.2. The FME shall implement documented procedures for the following: **A) On-product labeling with FSC logos and trademarks;** **B) Off-product/ promotional use of FSC or SCS trademarks and;** **C) Use of SCS trademarks.**			
A) Does the FME have records to prove that use of the FSC trademarks in on-product labels was submitted to, reviewed, and approved by SCS prior to use?	☐ **Yes**	☐ **No**	☒ **N/A**
B) Does the FME have records to prove that off-product/ promotional use of the FSC trademarks is submitted to, reviewed, and approved by SCS prior to use?	☒ **Yes**	☐ **No**	☐ **N/A**
C) Did the FME correctly implement procedures for joint-use of SCS and FSC trademarks?	☐ **Yes**	☐ **No**	☒ **N/A**
SCS Auditor Findings: DNR staff maintains records of communication with SCS staff over logo usage.			

1.5. OUTSOURCING

*What you need to know: If the FME outsources any of its chain of custody procedures (e.g., control, tracking, invoicing, labeling, etc.), processing or **handling** of FSC-certified material, the FME must retain ownership of that material, have procedures in place for working with the outsourcing organization(s), have an outsourcing agreement signed by the contractor(s), and provide the name and contact information of the contractor(s) to SCS. This applies to logging contractors and product transport services contracted by the FME to deliver the certified product to a designated FSC COC certificate holder. If the FME conducts stumpage sales (i.e., a certain FSC COC certificate holder purchases standing timber), then it is the responsibility of the certificate holder (either the FME or the purchaser) WHO ARRANGES for outsourced services to ensure that outsourcing procedures and agreements are in place.*

1. Does FME outsource any processes involved in the control, tracking, invoicing or handling of FSC-certified material?	☐ **Yes** *Complete section*	☒ **No** *Move on to question 2.*
2. Did the audit reveal any use of outsourcing by the FME that was unaccounted for?	☐ **Yes** *Complete section*	☒ **No** *If 'no' to both questions 1 and 2, skip this section.*
1.5.1. The FME shall provide the names and contact details of all outsourced services associated with the control, tracking, invoicing, and handling of FSC-certified material prior to transfer of ownership at the forest gate(s).		
SCS Auditor Findings:		
1.5.2. The FME shall prepare documented outsourcing agreements (e.g., contracts) for all outsourced services related to the FME's COC control system that occurs prior to the transfer of ownership at the forest gate(s).		

SCS Auditor Findings:
1.5.3. The FME and/or its contractors shall implement all outsourced COC control system processes, including those from sections 1.1-1.4, consistently.
SCS Auditor Findings: